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ABSTRACT

This report is a comparative analysis of the administration and implementation of Elementary and Secondary Education Act Title I programs in 32 local school districts in 8 states (un-named). The goal of the study was to explain and understand the major and diverse aspects of administrative behavior at the three levels of Title I program management responsibility--Federal, State and school district/school building. Efforts were made to: (1) determine the nature of State administrative policy and practice; (2) analyze the factors influencing different State Title I administrative policies and practices and the consequences of such differences for local Title I administration; and (3) suggest appropriate future strategies encompassing possible changes in Federal Title I legislation, guidelines, and administrative procedures. Topical areas of Title I administration were separated into two broad categories: the funds allocation issues and the program development issues. Suggestions are offered for enhancing Federal impact on compensatory education for disadvantaged children. (Author/AM)

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A STUDY OF THE ADMINISTRATION OF
THE ELEMENTARY AND SECONDARY
EDUCATION ACT (ESEA), TITLE I
IN EIGHT STATES

A COMPARATIVE ANALYSIS OF ESEA,
TITLE I IN EIGHT STATES

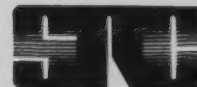
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and Martin E. Orland
with assistance of
Pascal D. Forgione, Jr.
and Sheila D. Huff

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UD 018 580

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expressed in this report are those of the authors.

A COMPARATIVE ANALYSIS
OF ESEA, TITLE I ADMINISTRATION
IN EIGHT STATES

by

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October 1977

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PREFACE

This study has taken the better part of two years. It started with a contract award by the National Institute of Education in February 1976, and concludes with the submission of this Report at the end of October 1977. It has generated site visits in eight state education agencies, 32 school districts and 116 schools and resulted in interviews with over 1,000 people. A professional staff of nine individuals at SRC and the participation of several consultants and many federal staff at NIE and USOE made this study possible.

Open-ended and semi-structured interviewing techniques were utilized for primary data collection in eight states and 32 school districts. Interviews were supplemented by careful review and analysis of appropriate documents and available data sources at the various levels of inquiry (federal, state, district and school building). One of the ground-rules for securing SEA/LEA agreement to participate and to allow their representatives to be interviewed was to promise confidentiality of sources and nondisclosure of the names of agencies involved. The material in this and all of our other reports has been carefully masked to meet this commitment and the names of states and districts coded as, for example, State A and District A-1.

The agreement to withhold the identity of individuals and agencies brought with it one major technical difficulty. The authors were unable to share drafts of the report with knowledgeable individuals in the respective agencies and communities, as would customarily be done in research of this kind. As a result, it has not always been possible to verify all data and inferences. Thus, there may be a few instances where certain data, inferences or impressions may be slightly off the mark. However, the SRC team worked diligently and systematically to minimize errors through cross-validations of data during their field studies.

Special acknowledgment for the success of the project should be expressed to the many individuals who worked on it throughout its 21 month history. We are particularly indebted to the special and substantial contributions of our Principal Investigator, Robert J. Goettel, Associate Professor of Education, State University of New York at Albany, who served as Project Director for the initial six months prior to accepting the university appointment. Not only did he conduct one of the eight case studies, he has participated actively in all phases of the project from its very beginning, in helping to conceive its thrust and approach, through the final version of this Report. Together with his considerable acumen and the continuing flow of his stimulating hypothesis, it was a joy working with him throughout the term of the project.

The sterling efforts of the Project Team were no less impressive and significant. Howard Blackman, Pascal Forgione, Jr., Sheila Huff, Kabby Mitchell, Martin Orland, Dana Paige and Douglas Williams, who comprised our four Case Study Teams and Project Staff at SRC, contributed generously throughout of their time, energies and talents. This report, in particular, has relied heavily on the special contribution of Martin Orland who wrote the final draft, Sheila Huff, for her always competent technical editing and production and Pascal Forgione, Jr. for his assistance in handling management aspects of this report's final printing/publication. These three individuals went far beyond the call of duty in their dedication to the task at hand; their devotion to this study was clearly evident throughout. It has indeed been a professional and personal privilege to work with all of them on this project.

Special consultants, too, contributed significantly. The study teams for the eight case studies utilized the services of: Marilyn Brannigan, Director, Central Schools Study Council, Syracuse University, Syracuse, New York; Frank Brown, Professor, Department of Educational

Administration, State University of New York at Buffalo, New York; David Carter, Associate Dean, College of Education, University of Connecticut; Tony Garcia, Consultant, Resource Program Development, Inc., San Antonio, Texas; Richard Reyes, Consultant, San Jose State University, San Jose, California; and Ercell Watson, Dean, School of Education and Community Services, Montclair State College, Upper Montclair, New Jersey. In addition, we utilized the services and suggestions of these and other individuals at the preliminary and developmental stages of the project: Norman Gross, Project Director, Urban-Suburban Interdistrict Transfer Project, Metropolitan World of Inquiry School, Rochester, New York; Herma Hightower, Director, ESEA Title I, Department of Education, Phoenix, Arizona; Joseph Lebediker, Principal, McKinley-Brighton Middle School, Syracuse, New York; and William Westley, Department of Sociology, McGill University, Montreal, Quebec, Canada.

Our progress and draft reports were reviewed and critiqued by Drs. Paul Hill, Donald Burnes, Christopher Wheeler, Floyd Stoner, William Hulten and Allen Rosenbaum of the National Institute of Education, and we are grateful to them for their many insightful and constructive suggestions and comments. We acknowledge, with thanks, the cooperation of the U.S. Office of Education, particularly the staff of the Division for the Education of the Disadvantaged and the Regional USOE Title I consultants. We also sincerely appreciate the always helpful advice of Mr. Robert Silverstein of the Lawyer's Committee for Civil Rights Under Law. The findings and interpretations as presented in this final report, however, are those of the authors specified and do not necessarily represent the views of NIE, our consultants, or SRC.

Our secretarial and support staff at SRC, especially that of Betty Johnson, Project Secretary, and Kathleen Conway, were substantial and, as always, well executed throughout.

Our Project Monitor at the National Institute of Education, Dr. Donald Burnes, was an invaluable colleague and friend in the conduct and final realization of this endeavor. His unflagging support, genuine concern and ready accessibility are greatly appreciated by myself and all others who worked with us on this project.

Finally, I thank all the unnamed individuals in the field at the state, local and school levels, numbering over 1,000, without whose contributions, obviously, there would have been no project; but far beyond that, it was indeed a privilege and a professional bonus that all of us will remember and carry with us, to have associated, if only for a few brief hours, with the many individuals who are so deeply involved and who are so critically needed in improving the educational futures of this nation's disadvantaged school children.

Bernard A. Kaplan
Project Director

October, 1977

INTRODUCTION

This study explores the dynamic interaction of people trying to improve the education of disadvantaged children through a federal categorical program. The program, Title I of the Elementary and Secondary Education Act, is one of great complexity. It is also a program about which little is currently known concerning the nature of actual administrative operations and, more specifically, the effects that administrative policies and practices of superordinate agencies have on subordinate governmental units. We believe strongly that such knowledge is critical to the development of improved administrative strategies to meet the special educational needs of disadvantaged children.

In order to accomplish the above objectives, our analysis correctly anticipated complexity rather than simplicity. Our goal was to explain and to understand the major and diverse aspects of administrative behavior at the three levels of Title I program management responsibility, i.e., federal, state and school district/school building. Our inquiries focused on actual administrative practices as well as stated policies at these levels, and continually sought to identify those factors and those relationships that seem to explain the nature of Title I program operations. While the magnitude of this task limited the intensity of the investigation in any single administrative area, we are confident that we have captured the basic nature of administrative processes and interactions prevalent in this important intergovernmental program.

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October 1977

LIST OF ABBREVIATIONS

AFDC	Aid to Families with Dependent Children
CSSO	Chief State School Officer
ESAA	Emergency School Assistance Act (federal program)
ESEA	Elementary and Secondary Education Act (federal program)
FY	Fiscal Year
HEW	(United States Department of) Health, Education and Welfare
K-2	Kindergarten through Grade 2
LEA	Local Education Agency
MTR	(USOE) Management Team Review
NIE	National Institute of Education/HEW
PAC	Parent Advisory Council
PTA	Parents and Teachers Association
RMC	Research Management Corporation
SEA	State Education Agency
SRC	Syracuse Research Corporation
Title I	Elementary and Secondary Education Act, Title I (federal program)
Title VII	Emergency School Assistance Act, Title VII (federal program)
USOE	The United States Office of Education/HEW

EXECUTIVE SUMMARY

Purpose of the Study

This report is a comparative analysis of the administration and implementation of ESEA Title I in eight states and 32 local school districts, four in each state. The broad purpose of this comparative policy study was to provide the National Institute of Education (NIE) and the United States Congress with an understanding of the ways in which and the extent to which federal and state administrative policies and practices influence the management of Title I programs at the local level. More directly, this study was designed to accomplish the following:

- *Determine the nature of state administrative policy and practice.*
- *Analyze the factors influencing different state Title I administrative policies and practices and the consequences of such differences for local Title I administration.*
- *Suggest appropriate future federal administrative strategies, encompassing possible changes in federal Title I legislation, regulations, guidelines, and administrative procedures.*

The task, then, was to determine the extent to which the structure of Title I administration--legislative provisions, program regulations of the Department of Health, Education and Welfare (HEW) and the United States Office of Education (USOE), federal and state administrative procedures--can and do lead to well administered Title I programs at the local level. Local Title I programs should be "well administered" in two respects. First, they should be run in a legal manner; that is, a manner which complies with Congressional expectations and USOE rules and regulations. Second, local Title I programs should be educationally effective; they should be designed and implemented in ways that enhance the probability that participating students will learn more and at a faster rate than they would have if the funds and programs had not been available.

It should be emphasized that it was not the purpose of this study to make definitive judgments about either the legality or the educational effectiveness of the Title I programs examined in the more than 100 schools included in these case studies. The case study teams did not assume the roles of compliance auditors or program evaluators. Rather, the structural linkages that constitute Title I's intergovernmental system were closely examined (the relationship between the federal government and the states, between the states and their school districts, between the school districts and their Title I schools, and between school administrators, teachers, teacher aides, parents, and Title I pupils). Such examinations indicate the conditions and characteristics of the current structure of program administration which seem to produce a reasonable promise of achieving the dual objectives of legally compliant and educationally effective program implementation. In short, this report represents an evaluation of the process of Title I administration, but not of the legal or educational outcomes.

Selection of States, School Districts and Schools

Over 1,200 interviews were conducted, and a comparable number of documents were reviewed pertaining to Title I administration in eight states, 32 districts, and 116 schools. In selecting the agencies and schools to be included in the case studies, the primary objective was to maximize the extent to which key contextual and administrative characteristics were evident for each potential site. Important criteria in selecting states included reported performance on USOE evaluations, geographical location, metropolitan/rural character, presence of a state compensatory education program, state political culture, inclusion in other NIE Title I studies, SEA organizational characteristics, and special problems associated with individual states.

Local district selection objectives were as follows:

- . One large urban LEA; where possible, the largest in the state.
- . Two middle-sized urban LEAs.
- . One relatively small LEA in a rural area.

In six of the eight states the largest urban LEA was selected. In the other two the second largest was selected, in one case because the largest LEA was involved in another NIE study and several other large districts were available. In the other case, the state was predominantly rural and the largest urban-type LEA had constantly been subjected to special studies. Recognizing the possible danger or tendency that many SEA officials might have for recommending LEAs considered by them to be running compliant and/or exemplary programs, the case study teams sought the counsel of non-SEA contacts before final selection was made. Since one of the major purposes of the study was to examine SEA administrative practices that had produced change in local program management, attempts were made by project staff to include some districts in which major changes in Title I program administration had been evidenced in the last three to five years.

A number of criteria were utilized in selecting Title I schools within each district. With an aim to including both typical schools and schools which might also serve as especially illuminating cases, the study teams, on the basis of discussions with LEA and non-LEA personnel plus examination of available documents, selected from two to six schools per district for special attention and visits. The selection criteria utilized for school selection included these items:

- . Grade level and spans.
- . Size of school.
- . Population groups served.
- . Subdistrict distribution.

- . Principal's tenure and degree of perceived leadership.
- . Parent Advisory Council involvement.
- . Program emphases.
- . Years as a Title I school.
- . Participation in the state's compensatory education program.
- . Status regarding Title I regulatory compliance ("exemplary," problem areas, change over time, etc.).

Additional Methodological Considerations

Most of the interviews and visits in USOE, SEAs, LEAs, and schools took place during the fall of 1976. The average time spent in a state consisted of 38 person-days distributed among the SEA, the four districts, the several schools, and other relevant sites.

Three-member teams conducted the case studies in the eight states. Pertinent documents were secured before, during, and after the on-site visits. These comprised state and local publications, reports, applications, memoranda, correspondence, technical assistance aids, and a large variety of both formal and informal, official and non-official materials. USOE/HEW reports and correspondence relating to the specific states and LEAs were also obtained and reviewed. Finally, throughout the study there were numerous telephone calls conducted with various individuals at the federal, state, local district, and school levels to obtain additional data.

In all, approximately 1,200 interviews were conducted with over 1,000 individuals. The types of individuals who were interviewed during this study included, in addition to Title I program administrators at the various levels, the following: educational agency executives, decision-makers and policy-developers; fiscal management personnel; research, planning, and evaluation staff; legislative liaisons; instructional and in-service training specialists; dissemination personnel; teachers; administrators; aides; parents; school board members;

university personnel; legislators; legislative analysts; private consultants; community representatives; and, on occasion, students.

To provide focus and a common thread throughout the various cases, a number of functional management areas and special Title I regulatory compliance (issue) areas were selected. At the federal, state, district and school level, special attention was directed to these areas as organizing concepts for obtaining the data that would comprise a major portion of the analysis.

In addition to determining program structures and organizations, the study teams attempted to discover strategies, emphases, and practices related to these areas of management: planning and policy-making; fiscal allocation and budgeting; technical assistance; monitoring; and dissemination/interpretation. The annual LEA application process was also carefully examined.

With respect to Title I regulatory areas, four relating to funds allocation and four emphasizing program development were selected for special attention across the eight case studies. These were as follows:

Funds Allocation Issue Areas

- . School Selection
- . Student Selection
- . Concentration of Effort
- . Comparability

Program Development Issue Areas

- . Needs Assessment
- . Program Design
- . Evaluation
- . Parent Involvement

Occasionally other regulatory areas would also be addressed because of their particular significance in a given situation. General Aid, Supplanting, Coordination, and Non-Public School Participation were examples of compliance areas occasionally covered in our inquiries.

Major Conclusions

Throughout the case studies, topical areas of Title I administration were separated into two broad categories: the funds allocation issues and program development issues. This was done because the nature of the Title I program posed two administrative questions: (1) Are districts providing resources in the legally prescribed manner so as to assure that these resources are being used for appropriate purposes and by an appropriate population? (2) Are districts designing their Title I activities so that these Title I resources are used in an optimal manner?

Historically, federal Title I administrators have focused their attention primarily on the former concern. Poor federal dissemination, weak state and federal monitoring procedures, inadequate motivation of State Education Agencies to comply with regulations, and recalcitrant school district personnel all contributed to major compliance problems in meeting funds allocation requirements during the first decade.

In the early 1970s, the federal government began to undertake major efforts to improve state and local performance in the funds allocation areas. It has continued this general thrust since that time, emphasizing the meeting of minimum compliance standards and more active dissemination of interpretations of the Title I regulations. In attempting to achieve its goals, the federal government has utilized HEW audits and the threat of such audits as a major vehicle for assuring locally compliant behavior.

As a result, considerable improvement in the administrative performance of SEAs and the LEAs has been evidenced in the last five to seven years. However, the level of administrative attention to the Title I regulations has been decidedly uneven in terms of the compliance categories and administrative effectiveness across the eight states visited. The findings suggest that the current federal role has often been a critical factor in explaining the nature of basic state Title I approaches, whether such approaches are adequate or less than adequate.

The current nature of the federal role remains appropriate for maintaining (and in two of our eight states significantly enhancing) current levels of state administrative effectiveness. However, a different federal approach (one that attempts to understand and then address varying role orientations of SEAs) is necessary if further major breakthroughs are to be attained. The distinctions between funds allocation and program development regulations are of sufficient order to warrant different approaches to their administration in the future.

Based on visits to eight states and 32 districts, the following are our major conclusions pertaining to the strengths and weaknesses of the federal government's current Title I policies and procedures:

1. *The basic framework of the current regulations must be preserved to assure the attainment of federal goals.*

We believe it is important to state explicitly that despite all the problems reported, our considered judgment is that the federal Title I regulations are not fundamentally dysfunctional, taken individually or together. Rather, we found that the regulations, when enforced, provide the foundation for effective administration of Title I programs. The regulations have thus far succeeded in establishing and protecting the existence of categorical Title I programs against countervailing influences in local and state settings. Without the compliance categories of the federal Title I regulations, the interests of educationally disadvantaged populations stand in clear danger of being displaced, by districts and states, in favor of competing interests. However, serious effort must be made to clarify state and local understanding of the requirements in order to clear up remaining compliance problems, overcome rigid responses to federal expectations, and promote program designs in keeping with local resources and needs.

2. *The intergovernmental relationships that function in Title I in the mid-70s should not be viewed as unrelenting combat between the federal government and state education agencies, between SEAs and their LEAs, or between those who accept the principles of compensatory education and those who wish to use the funds for other purposes.*

A lack of sufficient knowledge and managerial capacity and a number of legitimate local factors and concerns contribute to problems of Title I program administration. Improving program implementation over the next decade must begin with the discovery of state and local resources, needs, attitudes, knowledge levels, and administrative capacity. We witnessed a positive attitude on the part of the majority of state and local administrators toward managing the Title I program more efficiently, in basic compliance with federal regulations and in a way that maximizes the probability of effective educational programs. A combative administrative style and the overt use of authority seem productive only where states or local districts refuse to comply with regulations or refuse to make efforts to improve the effectiveness of their programs. Where states and districts are cooperative, productive intergovernmental relationships may require keeping the use of overt authority and sanctions in reserve.

3. *During the last few years sufficient improvement has been made in program administration in many states and local districts to justify confidence in the basic intergovernmental administrative model embodied in the legislation.*

While we would argue that no major, fundamental change in assumptions is warranted, a number of modifications should be considered in order to enhance both accountability and program flexibility.

4. *Most of the eight states and 32 LEAs studied manage Title I in a manner generally consistent with federal expectations and in a manner that has been strongly influenced by the federal government.*

Some of the states and local districts are administering the Title I program in a manner that is highly incompatible with federal expectations,

but these seem to be in the minority. The large majority of SEAs and LEAs in our study are sufficiently well motivated, structured, and staffed to enable them to meet satisfactorily most current federal expectations. Problems remaining in these states and districts are, for the most part, in areas in which federal expectations are either not clearly understood or too modest.

5. *Federal influence has been largely effective in inducing states and districts to address funds allocation responsibilities; it has been far less effective in inducing states and districts to attend to program development responsibilities.*

The federal government has been successful in fostering the development of a basic system of state and local policies and procedures for achieving accountability in the funds allocation areas. This system needs further refinement to maximize state and local performance. However, the system that has evolved is not currently equipped (in terms of motivation, knowledge, and capacity) to deal effectively with issues of program development. This deficiency is reflected in a general lack of systematic and sustained attention to these important responsibilities of states and local districts.

6. *The role orientation exhibited by an SEA is the most critical determinant of its administrative performance and the nature of LEA responses to state administrative initiatives.*

The federal government's interests are best served when state education agencies share federal program goals and exert leadership to assure compliance and program effectiveness. Ideally, the federal government should attempt to change the role orientation of states that currently view their Title I responsibilities as an administrative chore rather than a leadership opportunity. Though state and local contextual factors will probably make uniform attainment of that objective impossible, we are convinced that it is possible for the federal government to significantly affect an SEA's role orientation provided certain administrative policies and procedures are changed at the federal, state, and district levels.

Policy Recommendations

The recommendations presented below deal with the implications of the conclusions cited above. While many of our suggestions for enhancing federal impact do not challenge the current orientation of federal officials in administering the Title I program, some do. These latter suggestions directly respond to our conclusion that *although current federal Title I policies and procedures usually have been appropriate and effective in dealing with problems associated with funds allocation areas, current federal strategies are largely inappropriate and ineffective in addressing equally important federal, state, and local program development responsibilities.*

For addressing program development responsibilities, new federal strategies and policies need to be developed while the federal government simultaneously expands upon its established strategies to deal with problems that remain in the funds allocation areas. Maintaining and continuing established strategies is necessary to assure that old problems do not reappear. We wish to emphasize that meeting these challenges at the federal level is feasible and essential if the Title I program is to achieve goals embodied in the legislation.

Given the findings of this study, suggested changes in the federal government's oversight of Title I administration at the state and local level would be characterized by the following five key principles or themes:

1. *Rigorous attention must be given to completing the implementation of the basic funds allocation accountability system in states and districts where large scale compliance problems persist:*

- in states, primarily where there are major means/ends compatibility problems affecting responsiveness to federal expectations.

- in LEAs, particularly where there are overall problems in administrative effectiveness.

2. *Rigorous attention must also be given to upgrading enforcement activities where major compliance problems continue to exist. Especially needed are:*
 - more direct federal involvement with LEAs when states will not perform; and
 - greater coordination of HEW audit and USOE Management Team Review processes.
3. *Continued attention to compliance must be maintained with objectives to:*
 - close knowledge and management capacity gaps in states and local districts; and
 - assure that state and local administrators do not begin to neglect compliance monitoring responsibilities.
4. *Increased attention must be given to program improvement and parent involvement, and it should be recognized that:*
 - strategies may be required in these areas that are different from those that have been generally successful in assuring adequate attention to funds allocation requirements; and
 - greater attention to program improvement and parent involvement should not be implemented at the price of neglecting funds allocation responsibilities.
5. *Increased attention must be given by SEAs to LEA administrative processes as well as to LEA compliance with particular regulations, since those processes are major determinants of actual levels of compliance at the school and classroom levels and in the program development areas.*

The study identified eight problem areas and presents eight recommendations:

Problem Area No. 1

Interpretation of federal Title I regulations and suggestions on how to comply with them that are provided to states and districts are often vague or inconsistent.

Recommendation: *USOE should develop and disseminate more uniform interpretations of the Title I regulations; in addition, administrative coordination between USOE and the Division of Audits in HEW needs to be substantially upgraded.*

Problem Area No. 2

There is inconsistency between USOE and HEW and there is intra-agency inconsistency within USOE and HEW as to what constitutes noncompliance and what fiscal penalties should be imposed.

Recommendation: *The federal government should adopt, implement and actively disseminate uniform regulatory enforcement policies that are based on explicit principles of action in the event of state or local noncompliance.*

Problem Area No. 3

There is unevenness across the states in federal dissemination relating to compliant and effective Title I administration. This results in lack of knowledge and managerial capacity at the state and local level.

Recommendation: *USOE should be required to disseminate to SEAs, and SEAs in turn to LEAs, information pertaining to Title I legislation, regulations, guidelines, interpretations, and penalties in the event of noncompliance.*

Problem Area No. 4

Attention to and understanding of administrative responsibilities in the area of parent involvement was minimal in most of the school districts visited.

Recommendation: *SEAs, with considerably greater assistance from USOE, should intensify their present level of effort to attain compliance by LEAs with respect to the parent involvement requirements.*

Problem Area No. 5

SEAs in their oversight roles rely too heavily on superficial indicators in assessing local administrative effectiveness, especially in program development areas.

Recommendation: *The federal government should seriously consider changing (for many states) the annual LEA application and reporting cycle for Title I to a three- (or four-) year cycle.*

Problem Area No. 6

The federal government has relied too heavily on superficial indicators in assessing state administrative effectiveness and has not adequately addressed the differing role orientations, needs, and capacities of different states.

Recommendation: *The federal government should seriously consider requiring SEAs to submit a comprehensive three-year state plan for administering Title I, with annual updates as needed.*

Problem Area No. 7

Some states lack sufficient Title I administrative resources to adequately fulfill their administrative responsibilities.

Recommendation: *The federal government should redesign the administrative set-aside formula to take into account the number of LEAs in a state. It should also set a minimum set-aside level above the current figure. If possible, any increased state allocations resulting from this proposal should come from additional federal appropriations.*

Problem Area No. 8

There is often an absence of adequate coordination at the federal, state and local levels between Title I and other related categorical programs.

Recommendation: *All federal and state compensatory education programs should be administered within the same department in each SEA and within USOE. In addition, states should be permitted to combine compensatory education funds with Title I if the net result is that the combined funds are administered in accordance with Title I rules and regulations.*

CHAPTER 1

OVERVIEW

1.1 PURPOSE OF THE STUDY

This report is the culmination of an eighteen month effort to analyze the administration of Title I of the Elementary and Secondary Education Act (ESEA). This comparative policy study is based on individual case studies in eight states, including eight state education agencies (SEAs) and 32 local school districts (LEAs), four in each state. The broad purpose of this analysis is to assist the National Institute of Education (NIE/HEW) and the United States Congress in understanding the ways in which, and the extent to which, federal and state administrative policies and practices influence the management of Title I programs at the local level. Specifically, this case study analysis is designed to:

- *Determine the nature of state administrative policy and practice.*
- *Analyze the factors influencing different state Title I administrative policies and practices and the consequences of such differences for local Title I administration.*
- *Suggest appropriate future federal administrative strategies, encompassing possible changes in federal Title I legislation, regulations, guidelines, and administrative procedures.*

1.2 BACKGROUND

Our approach to the design of this comparative policy study of Title I administration at federal, state, and local levels has drawn heavily upon earlier studies of the implementation of federal programs in general and Title I in particular. Those that have had the most influence on our approach are as follows:

- *Studies of the administrative and political implementation of federal aid to education programs. These include Federal Aid to Education: Who Benefits? Who Governs?, directed by Joel S. Berke and Michael W. Kirst for the Syracuse (University) Research Corporation (1970); The Planar Corporation's study of ESEA Title I administration at the federal and state levels (1973); and State Education Agencies and Discretionary Funds: Grease the Squeaky Wheel: Implementation of ESEA Title V, by Jerome T. Murphy (1974). These studies provided us with an analysis of state responses to federal programs up to the early 1970's as well as a number of recommendations about how program administration could be improved.¹*
- *The "change agent" studies conducted by the Rand Corporation (1975). This set of studies focused on the responses of local school districts to federal programs intended to promote educational change.²*

¹ Joel S. Berke and Michael W. Kirst, Federal Aid to Education: Who Benefits? Who Governs?, (Lexington, Massachusetts: Lexington Books, D.C. Heath & Company, 1972).

"The Silken Purse: Legislative Recommendations for Title I of the Elementary and Secondary Education Act," The Planar Corporation, submitted to the Department of Health, Education, and Welfare, Contract No. HEW-05-72-224, (Washington, D.C., October 1973). See also Peter G. Briggs, "A Perspective on Change: The Administration of Title I of the Elementary and Secondary Education Act," Department of Health, Education, and Welfare, Contract No. HEW-05-72-224, (Washington, D.C., October 1973).

Jerome T. Murphy, State Education Agencies and Discretionary Funds: Grease the Squeaky Wheel, Lexington, Massachusetts: Lexington Books, D.C. Heath and Company, 1974.

² Paul Berman and Milbrey W. McLaughlin, "Federal Programs Supporting Educational Change," Vol. I, "A Model of Educational Change," HEW R-1589/ 1-HEW, (Santa Monica, California: The RAND Corporation, 1974); Paul Berman and Milbrey W. McLaughlin, "Macro and Micro Implementation," A RAND Paper, P-5431, (Santa Monica, California: The RAND Corporation, May 1975).

- *Studies of the evaluation of federal programs, most notably those produced by the Urban Institute between 1971 and 1977 that have focused on non-education programs and Milbrey McLaughlin's analysis of efforts to evaluate ESEA Title I.*³ The contribution of these studies to our project is in the conceptualization of factors that constitute key linkages between federal, state and local agencies.

These studies and their specific relationship to the development of our comparative research design are treated in detail in Appendix A.

Much of the period since the emergence of ESEA, Title I in 1965 has been characterized by considerable doubt as to the effectiveness of the intergovernmental partnership that is required in the Title I legislation. Two major concerns have emerged over the first decade of Title I: (1) compliance with federal requirements, and (2) evidence of improved learning of educationally disadvantaged pupils as a result of participation in Title I. In response to these two concerns, changes in the authorizing legislation have been made by Congress, and USOE has revised Title I regulations and management procedures. Some critics, nevertheless, continue to believe that compliant, effective Title I programs, as envisioned by reformers and intended in the legislation, are a rarity. Instead, it is often argued that local compensatory education activities funded by Title I are merely loose and idiosyncratic interpretations of Congressional intent.

³ Joseph S. Wholey, *et al.*, "Title I Evaluation and Technical Assistance," (Washington, D. C.: The Urban Institute, 954-22, February 1971); and Richard E. Schmidt, Pamela Horst, John W. Scanlon and Joseph S. Wholey, "Serving the Federal Evaluation Market," (Washington, D. C.: The Urban Institute, 962-24, January 1977). One of the first Urban Institute Evaluation Studies by Wholey and his associates directly addressed Title I evaluation and management issues.

Milbrey W. McLaughlin, *Evaluation and Reform: Title I of the Elementary and Secondary Education Act of 1965* (The RAND Corporation, R-1292-RC, January 1974); *idem*, "Implementation of ESEA, Title I: A Problem of Compliance," *Teachers College Record*, Vol. 77, No. 3, (Teachers College, Columbia University, February 1976); "Evaluation and Reform: The Case of ESEA Title I," (The RAND Corporation, 1974).

Looking back on the first decade of ESEA, there was a crucial assumption embodied in the federal legislation about the intergovernmental management partnership that was necessary to successfully implement Title I. This act represented a major innovation in intergovernmental relations; that was probably at least as great as the legislative assumption about the ability of additional resources to affect educational outcomes for disadvantaged pupils. The operational federalism inherent in Title I was both philosophically and organizationally very different from the nature of either the state/local or the federal/state relationships in education that had functioned prior to 1965.

Implementation of such an innovative relationship faced many obstacles. These included: (1) the vagueness of program objectives; (2) uncertainty about how to accomplish both educational and management objectives; (3) the necessity to hire new and often untrained staff to administer Title I programs at all three levels of government; and (4) a combination of administrative constraints, such as frequent changes in Title I program requirements, continuous turnover in administrative staff, as well as modifications in the organizational structure for managing Title I.

One of the primary policy-related research questions, therefore, is whether problems of Title I implementation are attributable to "growing pains" or are, instead, endemic characteristics of the intergovernmental partnership that can rarely be overcome. In short, are the assumptions embodied in the legislation tenable? Given the power of localism and the influence of state and local political cultures within which education services are delivered, does the Title I management system that has evolved work for a broad spectrum of states and local districts, or does it instead, demonstrate that congressional expectations were unrealistic?

One prominent view is that the Title I management system does not work very well, that states and local school districts find ways to make

federal funds work for their own purposes which often differ significantly from national goals. The federal government is seen as unable to overcome the dominance of local values because: (1) the goals and/or means of Title I have not been mutually accepted by each of the partners; (2) states are unwilling to accept their role and responsibilities; (3) administrators do not know how to comply with federal requirements and how to improve instructional programs; (4) there is a lack of management capability at the USOE, the SEAs, and/or the LEAs; and (5) USOE and the states lack both the will and the capacity to exert the authority required to assure compliance with federal expectations. These factors have reinforced the perception that the educational delivery system embodied in the ESEA, Title I legislation is a dismal failure due to the imbalanced influence of localism.⁴

On the other hand, a second position contends that federal government has been too prescriptive and rigid in the way federal aid programs are structured and administered. State and local officials fear that the "junior partner"--meaning the federal government, since it pays the smallest share of total costs--may be "taking over the firm." Though he was not referring specifically to Title I, one Chief State School Officer has recently written that, "slowly, inexorably, and incrementally, the federal government is taking over education. Especially since 1965, the country has moved . . . toward a national system of education."⁵ This fear of federal influence has contributed to the position, held by many state and local officials, that federal responsibility should end once federal funds have been allocated to state and local agencies.

⁴ Appendix A includes a review of previous studies of the administration of federal education programs in general and ESEA, Title I in particular.

⁵ Joseph M. Cronin, "The Federal Takeover: Should the Junior Partner Run the Firm?" Phi Delta Kappan, June 1976.

In contrast to the two above extreme views, there is a "middle-of-the-road" position on the proper role of the federal government in administering programs such as Title I. A number of observers, who accept the fundamental principles of Title I and who find the federal government's interest in providing for the extra needs of special target groups of pupils to be legitimate, are concerned that the extensive specificity of federal requirements actually impedes the ability of local districts to fulfill the national purposes and expectations of ESEA, Title I.

Along with the broad mandate by NIE to examine and report on the overall effectiveness of Title I administration per se, this study was designed to address these contrasting views of the effect of Title I administrative requirements and practices on local Title I programs. What emerges from our analysis of the implementation of Title I programs in eight states, 32 school districts, and 116 schools is a picture of the ultimate impact of state and federal policies and practices (the independent variables) on local Title I program practices (the dependent variables). We examine the characteristics of state administration that appear to have the most influence on local districts as well as those that seem to have either no effect or a negative impact on local activities. Our analysis is framed around those contextual factors, characteristic of state and local school districts, that either serve as determining factors or require special understanding in designing changes in federal legislation or administrative procedures.

1.3 SRC RESEARCH FOCUS

Our first task in this study was to discover the extent to which state administrative activities can and do lead to *well administered* Title I programs at the local level. Local Title I programs should be "well administered" in two respects. First, they should be operated in a *legal* manner; they should comply with congressional expectations and the rules and regulations established by the United States Office of

Education (USOE). Second, local Title I programs should be educationally *effective*; they should be designed and implemented in ways that enhance the probability that participating students will learn more and at a faster rate than they would if the funds and programs were not available. As part of this second objective, Title I programs should be amenable to meaningful evaluations. Program objectives and procedures should be subject to methodologically sound evaluations designed to provide useful information for improving program procedures and, where appropriate, eliminating or expanding entire programs.⁶ In short, the design of Title I programs and the management procedures for implementing those programs should encourage accountability at each level of government which, in turn, should lead to continuing efforts to improve program effectiveness.

Because of our two-dimensional approach to understanding effective Title I administration (legality and effectiveness), we will frequently discuss state and local approaches to *regulatory compliance* separately from approaches to *program development and improvement*. Eight Title I regulatory areas were selected for special attention across the eight case studies. Four relate specifically to funds allocation areas (school selection, student selection, concentration of effort, and comparability), and four others address program development areas (needs assessment, program design, evaluation, and parent involvement).

1.4 RESEARCH QUESTIONS

Based on our review of the previous studies of Federal Program Administration, and taking the above concerns into account, we identified fifteen research questions that specifically guided our field work and analysis. The questions fall into three categories:

⁶ Joseph S. Wholey, Joe N. Nay, John W. Scanlon, and Richard E. Schmidt, "Evaluation: When is it Really Needed?" *Evaluation*, Minneapolis Medical Research Foundation, Inc., February 1975, p. 90.

- I. Questions focusing on the nature of federal/state/local Title I administrative relationships;
- II. Questions relating to the quality of specific state and local Title I administrative activities;
- III. Questions relating to the nature of the federal role in Title I administration.

Category I: Questions Focusing On the Nature Of Federal/State/Local Title I Administrative Relationships.

1. How do differences in the administrative orientation of state Title I efforts affect the nature of state/local relationships?

The nature of the social, political, and administrative context in which state educational policy has been formulated and has been implemented can be expected to correspond to a state's administrative style—or what we term its Title I role orientation. A major interest of this study was to ascertain how these different state role orientations are manifested in various states, what factors contribute to their development, and how they impact on state/local administrative relationships and ultimately local Title I activities.

2. How prevalent are problems of means/ends incompatibility among the various levels of administration? When present, how do they affect the nature of intergovernmental administrative relationships, and ultimately local Title I activities?

Do officials at each level of the Title I intergovernmental delivery system share the same fundamental purposes of the program; namely, that Title I funds are to be used to provide supplementary educational services to those pupils most in need of such services in schools with the highest concentrations of low-income pupils. Do officials at each level accept their responsibilities to administer the Title I program in compliance with federal regulations; and, where the federal government has prescribed means for achieving these goals, do officials at the state and local level agree with these prescriptions? With respect to each of

these questions, we need to explore: (a) the extent to which compensatory education means/ends are shared by officials at each level of the Title I delivery system; (b) which means/ends seem to produce important deviations from the federal intention; and (c) how means and ends of state and local Title I administrative efforts can be made to correspond with federal expectations.

3. *From a local perspective, does there seem to be a need for greater oversight by federal and/or state Title I officials?*

Since some portion of means/ends incompatibility stems from knowledge gaps or problems of managerial capacity at the local level, there is a need to determine: (a) if local officials are well-informed as to federal and state expectations for their administrative performance, and (b) whether the requisite skills and resources for meeting these expectations are available at the local level.

4. *Do local officials see the state and/or the federal government as having a legitimate role to play in overseeing local Title I program operations? Is this legitimized role consistent with federally assigned state responsibilities for Title I program administration?*

Do local Title I officials view their counterparts at the state or federal level as individuals who have legitimate authority and/or expertise; that is, are federal and state officials viewed as persons who: (a) know how to achieve the purposes of Title I, (b) are legally empowered to do so, and (c) are competent in transmitting that knowledge to local administrators?

Category II: Questions Relating To the Specific Nature Of State and Local Title I Administrative Activities.

1. *What policies or requirements are appropriate for improving the effectiveness of Title I programs and services? Do program development requirements (needs assessment, program*

design, evaluation and parent involvement) necessitate a different approach by federal and state agencies than do funds allocation requirements?

Current federal requirements in the areas of needs assessment, program design, program evaluation, and parent involvement are treated in essentially the same manner as the funds allocation requirements where compliance is basically synonymous with attainment of allocative goals. The case study research was designed to: (a) investigate whether or not current state administrative efforts are appropriate and sufficient; and (b) whether or not an operational distinction should be made between funds allocation and program development regulations and strategies.

2. *Are goals of compliance and program effectiveness compatible with respect to the federal Title I regulations?*

We noted earlier the claim by some observers that there may be an irreconcilable tension between concern with compliance and efforts to improve the effectiveness of compensatory education programs. While the "irreconcilable tension" assertion may be more perception than fact, we will explore its effect on local Title I program operations and consider potential strategies for dealing with this perceived tension.

3. *How do specific state management practices (such as application approval, technical assistance, monitoring, enforcement, and internal management structures) affect the quality of local Title I activities?*

States communicate with local districts in a variety of ways and through a variety of organizational vehicles. This report examines the impacts of these different administrative instruments and structures on local administrative activity.

4. *What changes, if any, need to be considered with regard to specific federal legislative requirements or administrative regulations?*

A central purpose in reviewing ESEA, Title I programs was Congress' interest in identifying those areas where state and local program administration would benefit from federal rule changes, clarification, or more active information dissemination. The utility and function of current Title I requirements are important concerns of this study.

5. *What problems exist in coordinating Title I with state compensatory education programs, and what will be the likely outcome if states are permitted to merge state and federal programs?*

Almost one-third of the 50 states and four of the eight states studied have state compensatory education programs with basically the same purposes as Title I. Understanding the similarities and differences in the state and federal programs and the state role in both programs is critical to answering this question.

Category III: Questions Relating To the Nature Of the Federal Role In Title I Administration.

1. *What characteristics of state and local administration of Title I can Congress influence either through federal legislation or through federal (USOE/HEW) administrative action?*

Previous evaluations of Title I, and more general observations, suggest that the federal government can have an incremental effect on state and local compliance with specific rules and regulations, and in many cases, on specific administrative procedures. Given the recognized influence of administrative, social, and political contextual factors, a key question is whether the Congress and USOE/HEW can influence the basic orientation of SEAs toward Title I administration. Similarly, in those cases where the state Title I office is more in tune with federal expectations than the leadership of the SEA, what can USOE/HEW do to support the efforts of a responsive Title I staff?

2. *Do differences among states in the capacity and willingness to manage Title I in accordance with federal expectations warrant the federal government's treating states differently?*

Some studies have recommended that the federal government provide greater discretion in administration of federal programs to those states which are fulfilling their management responsibilities in an exemplary manner than to states performing less satisfactorily.⁷ The idea of differential treatment of states has not received a warm reception in Washington. One prominent reason for this is the expected political difficulties that USOE would encounter in establishing differential expectations for various states. Nevertheless, some degree of differential administration already exists, though it is not formalized. The idea of formally recognizing that the needs and capacities of the fifty states differ substantially must be considered. This report examines administrative areas where uniformity among states should be preserved, and those where greater flexibility could increase the effectiveness of state administration of Title I programs.

3. *Do federal officials have sufficient authority to enforce federal Title I regulations?*

What is the effect of the authority that is currently available? Based on our view from the states and local districts, are federal officials willing to use available authority? Do federal officials need additional authority in order to insure state and local compliance?

4. *What is the effect of the threat of federal audits on Title I administration? And how has the federal government's difficulty in recovering funds cited in audit exceptions influenced state and local behavior toward federal Title I regulations?*

If one looks only at the very low percentage of Title I funds which have been recovered on the basis of federal audit "exceptions" over the

⁷ Joes S. Berke and Michael W. Kirst, *ibid.*, and "The Silken Purse," *ibid.*

past ten years, one would suppose that the audit process would not serve as a deterrent to noncomplaint behavior. State and local attitudes toward the audit process and the extent to which the possibility of an audit "exception" influence administrative behavior are two important subjects of this report.

5. *Should the 1% state administrative set-aside for Title I be adjusted?*

This study examines whether states that receive the minimum set-aside amount seem to have sufficient resources to effectively fulfill their obligations under the legislation.

6. *Do federal dissemination practices match state and local needs?*

One of the criticisms of Title I has been that the SEAs and LEAs do not know how to comply with the federal requirements. In part, it is asserted, this occurs because many of the regulations lack clarity. But, it also may be the case that although definitive interpretations have been made, SEAs and LEAs are not aware of those interpretations.

1.5 METHODOLOGICAL APPROACH TO THE STUDY

A. Criteria for Selecting the Eight States

The following criteria were employed in selecting our sample of eight states.

1. USOE Evaluations of State Education Agency Performance In Administering Title I: SEAs were classified into four groups based upon administrative performance over the past five years.⁸

⁸Our study was limited to the 48 states within the continental United States. Classifications were based upon SRC staff's analysis of USOE reports and documents, and on interviews with officials of the Division for Education of the Disadvantaged, USOE/HEW.

-Consistently High: States whose performance in all areas have been consistently rated high throughout the five-year period. (Seven of the pool of 48 states were included in this group.)

-Major Improvements: States whose performance improved substantially over the last five years. (Eleven states were included in this group.)

-Uneven Performance: States in which there seems to be considerable variation among the thirteen areas of management activity appraised by USOE. (This was the largest group with twenty-one states.)

-Weak Performance: These states were rated consistently low in administrative performance over the last five years relative to other states. (There were nine states in this category.)

2. Geographical Location: We wanted at least one state from each of the four regions of the nation: Northeast, Southeast, Midwest, Far West.
3. Metropolitan/Rural Character of the State: At least two of the eight states selected were to be predominantly rural in character and at least four were to be predominantly metropolitan with large urban area(s). The last two states were to be either metropolitan or a mix of metropolitan and rural areas.
4. Presence of a State Compensatory Education Program: About one-third of the states have their own state level compensatory education programs which complement Title I. While some programs are quite modest, others represent extremely important elements in the state school aid system and are particularly important in determining how each state elects to handle the administration of Title I. At least two and, if possible, three of the eight states were to have a strong state compensatory program.

5. State Political Culture: One way to understand state educational policymaking is to focus on the dominant value of the political culture in each state. The way that states operate in administering educational programs reflects not only the policies formulated and executed by a given state agency, but also the character of existing cultural values of a state or region. Political culture, therefore, can have a particular significance for how a state agency actually implements policy.

Daniel Elazar has developed a typology of state political cultures that sorts states into Individualistic, Moralistic, or Traditionalistic types.⁹ The major assumption emerging from the work of Elazar and others is that political culture has a similar impact on individuals, groups, institutions, and governmental agencies. The dominant values affect those who deliver services as well as those who receive them. The state policymaking systems, therefore, in order to maintain stability, are expected to conform to these values, as well as to support the expectations and behavior of other institutions, special interest groups, and agencies in the environment. If one follows this line of reasoning, then one can assume that the type of political culture of the states will affect the responsiveness of state educational policymaking and policy implementing bodies including those responsible for administering Title I.

The nature of these types of political culture are as follows:

-Individualistic: In states with individualistic political cultures, responsiveness to individual views will be important. Public opinion will often lead governmental agencies to respond to citizen demand by providing programs and opportunities in an effort to maintain public support. Once programs are adopted, state agencies will usually operate with little

⁹Daniel L. Elazar, American Federalism: A View From the States (New York: Cromwell Company, 1975), p. 84-96.

external restraint. State educational policymaking systems that operate within an individualistic political culture are also likely to establish structures for regulating, screening, and sometimes protecting themselves from citizen demand.

-Moralistic: Moralistic political cultures emphasize the well-being or the general welfare of the citizenry. They are less concerned with responding directly to public opinion and citizen demand than with using government as a positive instrument to promote public good. Though there is some overlap between individualistic and moralistic principles, in general private goals are subordinated to public goals in moralistic states.

-Traditionalistic: Traditionalistic political cultures place importance on preserving the existing social order. Similarity to the moralistic cultural context occurs only at the point at which government plays a positive and sometimes interventionist role on local communities. Traditionalistic political cultures tend to place more value on conservatism and custodial, if not paternalistic, care of traditional patterns of living. There is little necessity for innovation and strategies for increasing the responsiveness of state educational policymaking systems, particularly if such innovations are designed to change traditional lifestyles. Thus, there is little necessity for establishing vehicles that would improve communications between the public and the educational policymaking system. These systems exist primarily to carry out ministerial functions.

Our selection of the eight case study states included all three of these political cultures.

6. Lawyers Committee for Civil Rights Under Law (LCCRUL)

Sample States: The LCCRUL had collected data in ten states in connection with their study for the NIE.¹⁰ We attempted to avoid selecting LCCRUL states when an acceptable alternative state was available, in order to minimize the burden on the SEA.

¹⁰Robert Silverstein and Daniel M Schember, An Analysis of the Necessity, Clarity and Representativeness of the Program Requirements Applicable to Local School Districts Applying for Grants Under Title I of the Elementary and Secondary Education Act of 1963 (Washington, D.C.: Lawyers' Committee for Civil Rights Under Law, December 1976).

7. State Title I Administrative Characteristics: We were concerned about three organizational characteristics sometimes found in SEAs:

-Centralized versus Dispersed Authority: In many SEAs, Title I is administered through a single, tightly-knit group with all staff involved in the program reporting to a single director. In a few states, however, Title I administrative functions are widely dispersed throughout the SEA, many persons are assigned to the program only part-time, and the lines of authority do not come together until they reach the associate commissioner level. Since we would expect dispersion to inhibit the development of a Title I "client bureaucracy," examples of each of these organizational patterns were included in selecting the eight states.

-Regional Organization: Several states have begun to regionalize Title I administration in order to provide more frequent and immediate services to LEAs. Since we were interested in the extent to which regionalization affects program administration at both the SEA and LEA levels, states were selected that utilized this organizational pattern.

-Separation of Technical Assistance and Monitoring Functions: One line of reasoning about the organization of Title I administration claims that the same individual responsible for providing technical assistance to an LEA should not also carry out monitoring activities, since he/she may have too much of a personal attachment to local officials to be objective about district performance. Though only a very few SEAs have formally separated the two functions in terms of staff assignments, we wanted to include at least one example of such a pattern in the eight states selected.

8. Special Concerns: In making the final selection of the pool of eight states, additional factors needed to be considered. These included: (a) a history of USOE-SEA controversy; and (b) the aggregate and relative number of local districts in the states (e.g., we would seek some states where the number of districts in the SEA is relatively large and some in which the number is relatively small--in other words, we would not want all eight of the final case study states to be of the same character in this respect).

B. Process of Selecting the Case Study States

The steps by which the eight states were selected were as follows:

Step 1. Each of the states, with the exception of Alaska and Hawaii, was classified into one of the four performance groups noted above based on a review of USOE documents and interviews with staff in the Division for Education of the Disadvantaged in USOE. The annual Management Team Review Reports and correspondence associated with those reviews served as primary documents. USOE staff visit each of the approximately ten states in their area (consisting of two of the ten HEW regions) for approximately one week each year to interview SEA Title I staff and to observe Title I programs in several local school districts. The primary focus of attention during these visits is as follows:

- Organization and Staffing.
- Fiscal Management.
- Program Development.
- Target Area Selection.
- Comparability.
- Needs Assessment.
- Non-Public Schools.
- Parent Involvement
- Performance Objectives.
- Evaluation.
- Dissemination of Public Information.
- Program Monitoring.
- Neglected and Delinquent.

At the conclusion of each visit to a state, a narrative report is prepared by USOE that summarizes major strengths and weaknesses in the state's administration of Title I and in which recommendations for improvement are made. The narrative report is usually sent to the state's CSSO for his/her review and response.

- Step 2. The forty-eight states were then reduced to an initial candidate list of eighteen based on our confidence in the original assignments plus the additional criteria 2 through 8 noted above.
- Step 3. The initial list of eighteen states was further reduced to ten based upon SRC interviews with USOE staff and more detailed examination of documentation on each state.
- Step 4. Site visits to each of the ten states were conducted in the Spring of 1976 by the case study team leaders for the purpose of interviewing SEA staff in order to (a) confirm our initial assignments of states to category groups, (b) clarify state characteristics with respect to criteria 2 through 8, and (c) determine the best match of states, local districts and policy issues. Additionally, we determined the receptiveness of SEA officials toward participation in the study and we sought to identify potential LEAs for selection and to determine the probable receptiveness of each candidate LEA.
- Step 5. The final eight case study states were selected by providing the intended representation for each of the items in the selection criteria. Three of the ten candidate states were not selected, so the eighth state was, in fact, added without a preliminary on-site visit. Selection of the eighth state was, instead, based upon phone contact with SEA officials and other persons knowledgeable about Title I administration in that state.

C. Selection of LEAs and Individual School Sites

The process of selecting school districts and individual school sites was, like the selection of states, designed to provide representation of characteristics and problems, though there was no presumption that the four LEAs in each state would be representative of the state, nor that a small number of schools would be representative of an entire district. The responsibility for district and school selection rested totally with the case study team assigned to each state. Our LEA selection objectives were as follows:

- One large urban LEA; where possible, the largest in the state.
- Two middle-sized urban LEAs.

-One relatively small LEA in a rural area.

In six of the eight states, the largest urban LEA was selected. In the other two the second largest was selected. In one case, this decision was made because the largest was involved in another major NIE study, and because several alternative large districts were available. In the second case, the state was predominately rural and the largest urban LEA had constantly been subjected to special studies and was, therefore, rejected.

Recognizing the possible danger or tendency that many SEA officials might have for recommending LEAs considered by them to be running compliant and/or exemplary programs, the case study teams usually sought the counsel of contacts outside SEAs before final selection was made. Since one of the major purposes of the study was to examine SEA administrative practices that had produced change in local program management, attempts were made by our staff to include some districts in which major changes in Title I program administration had been evidenced in the last three to five years.

A number of criteria were utilized in selecting Title I schools within each district. With an aim to including both typical schools as well as ones which might also serve as especially illuminating cases, the study teams, on the basis of discussions with LEA and non-LEA personnel plus examination of available documents, generally selected from two to six schools per district for special attention and visits. The selection criteria utilized for school selection included:

- Grade level and spans.
- Size of school.
- Populations served.
- Geographic location.
- Principal's tenure and degree of perceived leadership.

- PAC involvement.
- Program emphases.
- Years as a Title I school.
- Participation in the state's compensatory education program.
- Status regarding Title I regulatory compliance ("exemplary," problem areas, change over time, et cetera).

116 individual school sites were ultimately included in our study.

D. Additional Methodological Considerations

The bulk of the interviews and site visits to USOE, SEAs, LEAs, and the individual Title I schools were conducted during the fall of 1976. The average time spent in a state was 38 person-days which were distributed among the SEA, four districts, and approximately 14 Title I schools.

Three-member teams conducted the respective case studies. Pertinent documents were secured before, during, and after the on-site visits. These included state and local publications, reports, Title I applications, memoranda, correspondence, technical assistance materials, and a large variety of both formal/informal and official/non-official documents. USOE/HEW reports and correspondence relating to the specific states and LEAs were also reviewed. Finally, throughout the study supplementary information was obtained through numerous telephone conversations with individuals at the federal, state, local district, and school levels.

In all, approximately 1,200 interviews were conducted with over 1,000 individuals. In addition to Title I program administrators at the various levels, the following types of individuals were interviewed during on-site visits: educational agency executives and policymakers; fiscal management personnel; research, planning, and evaluation staff; legislative liaisons; instructional and in-service training specialists; dissemination personnel; teachers; administrators; aides; parents;

school board members; university personnel; legislators; legislative analysts; private consultants; community representatives; and on occasion, students.

To provide focus and a common thread throughout the various cases, a number of functional management areas and special Title I policy (issue) areas were selected. At the federal, state, district and school level, special attention was directed to these as the means for obtaining the data that would comprise a major portion of our analysis.

In addition to determining program structures and organizations, the study teams attempted to ascertain SEA and LEA approaches, emphases, and practices related to these areas of Title I management: planning and policymaking; fiscal allocation and budgeting; technical assistance; monitoring/enforcement; and dissemination/interpretation. The annual Title I application process was also carefully examined.

With respect to Title I regulatory areas, four relating to funds allocation and four emphasizing program development were selected for special attention across the eight case studies. These were as follows:

Funds Allocation Issue Areas

- ° School Selection
- ° Student Selection
- ° Concentration of Effort
- ° Comparability

Program Development Issue Areas

- ° Needs Assessment
- ° Program Design
- ° Evaluation
- ° Parent Involvement

Occasionally other regulatory areas would also be addressed because of their particular significance in a given situation. General aid, supplanting, coordination and non-public school participation were examples of some of these other policy issue areas that sometimes emerged in our investigation.

Our study was restricted to ESEA, Title I, Part A only. We did not consider such other portions of the program as Neglected and Delinquent, Handicapped (89-313), or Migrant, Part B.

1.6 CAVEAT

Before turning to our analyses in Chapters 2 through 8 and our recommendations in Chapter 9, we would like to place what follows in perspective. Hopefully, a study such as this one that is designed to evaluate the implementation of a public policy considers the accomplishments as well as the shortcomings of federal, state, and local administrative actions. But, since one of our basic tasks is to identify ways in which the Title I program needs to be improved in order more effectively to match national expectations, the remaining chapters, of necessity, predominately focus on problems--on what doesn't work and why--more than on what is working. Even when we discuss situations where major administrative improvements have occurred, the impression conveyed often concerns the depth of the problems rather than the effectiveness of "solutions" that succeeded in establishing a new level of administrative performance. We make no claim, therefore, that this report strikes a realistic balance between what works and what does not work, between what is good about Title I and what needs to be changed.

This lack of balance in our report concerns us. Given the many earlier studies of federal aid programs in general and Title I in particular, and the personal contact that many of us have had over the past five or ten years with SEAs, LEAs, and compensatory education programs, our research team of more than a dozen individuals went into the field expecting to find many fundamental problems in the administration of this program. While the problems, observations, and conclusions that we discuss in the following chapters attest to the fact that Title I continues to be imperfectly implemented, we believe that the current

overall picture is far more encouraging than it was just three or four years ago. In our visits to 116 schools and our interviews with more than 1,000 individuals at each level of the Title I system, we became convinced of the fundamental correctness of the design of Title I and of the nature of the intergovernmental relationship required to make the program work. We were struck by the presence of key individuals in every state and almost every district and school who shared the broad goals of compensatory education, who were really trying to make their program work, and who often were doing so with considerable skill. Many, many schools that our teams visited would have been very different places in the Fall of 1976 if there never had been a Title I program.

But, of course, there are also situations where the Title I system does not work very well for educationally disadvantaged children. Sometimes this occurs because of a lack of commitment or understanding, or because of a lack of knowledge, skills, or resources. It is those situations, then, that provide much of the focus of the remainder of this report.

* * * * *

The following chapters present the results of our 18-month study as they pertain to the 15 research questions delineated earlier in this chapter. Chapter 2 covers the terms, definitions, and areas of inquiry dealt with in subsequent chapters. Chapter 3 sets forth an analytic framework. Concepts introduced in Chapter 3 are more fully developed and utilized in discussions of the general nature of state/local administrative interactions in Chapter 4, issue-specific state impacts on local policy and practice in Chapters 5, 6 and 7, federal/state administrative relationships in Chapter 8, and policy considerations in Chapter 9.

CHAPTER 2

TERMS, DEFINITIONS AND AREAS OF INQUIRY

To provide focus and a common thread throughout the various cases, a number of organizational considerations, functional management areas, and ESEA Title I policy issue areas were selected for study. At the federal, state, district and school levels, special attention was directed to these concerns throughout the interviews and document reviews. The following sections provide brief descriptions of the organizing concepts around which we framed our Title I case study analyses. These do not represent official Title I definitions, but rather reflect an understanding of the terms and inquiry areas that the SRC case study research staff developed during the conduct of this study of ESEA, Title I administration in eight states.

We need to inform the reader of the special masking code that will be used throughout this synthesis volume and in all eight case study volumes. One of the ground rules for securing SEA/LEA agreement to participate and to allow their representatives to be interviewed was to promise confidentiality of sources and nondisclosure of the names of individuals, agencies, and geographical locations involved. The material in this report has been carefully masked to meet this requirement.

- The letters A through H have been substituted for state names.
- In each of the eight states, we discuss Title I administration in four LEAs, including: one of the largest school districts in the state (designated as No. 1); two middle-sized districts (designated as No. 2 and No. 3); and a small rural district (designated as No. 4). For example, in State A, we will discuss Title I administration in districts A-1, A-2, A-3, and A-4.
- The identity of specific state and local agencies, bureaus, divisions, units, and programs has also been masked in most instances to insure confidentiality.

Using the definitions outlined below, we will subsequently examine state policies that are associated with: (a) specific state organizational and management approaches to Title I administration (Chapter 5); (b) the funds allocation areas of the Title I regulations (Chapter 6); and (c) Title I program development requirements (Chapter 7).

2.1 KEY MANAGEMENT AREAS AND INTERNAL ORGANIZATIONAL STRUCTURES

One of the goals of our study was to analyze and assess the impacts of specific aspects of state administrative policy and practice on local administrative activity. Four key aspects of Title I management and three major types of structural characteristics of state Title I administration are specifically discussed in each of our eight state case studies.

The key management and structural terms are defined below.

A. Key Management Functions

The case study teams, in each case, sought to ascertain the nature and impact of state program management approaches on local administrative activities. To do this, it was necessary to identify approaches, emphases, and practices related to several specific areas of Title I management. Our analyses focused on four key aspects of Title I management:

- Application Approval. The process by which local districts request and receive Title I allocations from the state education agency.
- Technical Assistance. Assistance of a technical nature provided by the Title I office to agencies either in conjunction with monitoring activities or separate from them.
- Compliance Monitoring. Oversight activities engaged in by the state Title I office to determine whether local districts comply with state and federal program requirements.
- Regulatory Enforcement. State procedures for assuring local compliance with state and federal program requirements.

Two additional SEA management activities that received less extensive treatment in the case studies were:

- Interpretation. Statements made by the state Title I office which provide any clarifying or supplementary language to existing USOE/SEA regulations or which add provisions in USOE/SEA regulatory areas.
- Dissemination. Means by which local districts or schools are made aware by the state of Title I regulations, guidelines, and policy interpretations which have been made in a given regulatory area. The SEA is also responsible for identifying exemplary Title I programs, as well as management and technical approaches used by certain LEAs, and sharing these statewide through state-sponsored workshops, conferences, or meetings.

Other state Title I management functions that were also examined included planning and policymaking, budgeting, and state subcounty allocations.

B. Internal Organizational Structure

Three major types of structural characteristics of state Title I administration were explored in the eight case study states: the existence of centralized versus dispersed Title I authority within the SEA; the existence of regional Title I offices; and the dichotomization of technical assistance and monitoring roles.

- Central Versus Dispersed Staff. Title I administration within an SEA will be considered "centralized" if administrative responsibilities for Title I application review, technical assistance, compliance monitoring, and regulatory enforcement are located primarily within one department and there is a core staff assigned to that department whose primary time allocations are to Title I administration.
- Regional Versus Non-Regional Structure. State Title I administration will be considered "regionalized" if any of the four key management functions have been located outside of the SEA Title I office and there is a core staff assigned to these regional offices or units whose primary time allocations are to Title I administration.

- Dichotomization of Technical Assistance and Monitoring Roles. The technical assistance and monitoring roles will be considered "dichotomized" if separate individuals carry out these functions, as opposed to one individual assuming both responsibilities vis-à-vis districts for which they are responsible.

2.2 MANDATED TITLE I POLICY REQUIREMENTS

With respect to Title I policy issues, some can be classified as relating primarily to funds allocations within participating school districts while others can be regarded as more program development centered. The former pertain to how Title I funds are spent within a district or a school and involve the extent, location, distribution, and relative weighting of these expenditures. The latter refer to the nature or quality of the Title I program itself, and entail questions concerning type of program emphasis, procedures for determining priority areas and effectiveness, and which individuals or groups are included in planning and design. Four of each of these areas were selected for examination across the various levels and sites included in the study. They are listed and defined below.

A. Funds Allocation Issue Areas

- School Selection. School selection standards or procedures are those which prescribe or determine which attendance areas and/or schools from among all schools in a district will be selected to participate in Title I programs.
- Student Selection. Student selection standards or procedures are those which prescribe or determine which students, from among all students in a Title I school, will be selected to participate in a Title I program.
- Concentration of Effort. Standards intended to assure that Title I education program funds are provided for the participant student population in amounts needed to deliver services of sufficient size, scope, and quality to give reasonable promise of success.
- Comparability. Standards or procedures to assure that resources provided for the participating Title I student population are comparable (i.e., approximately equal) to those provided for non-Title I students before the addition of Title I funds.

Three additional fiscal allocation areas that were frequently but not uniformly addressed in our case studies were as follows:

- Resource Allocations to Schools. Standards or procedures which determine the level of resource allocations to individual schools or other subdistrict educational units.
- General Aid. Standards which assure that a Title I project is tailored to meet one or more of the special educational needs of educationally deprived children and not merely to meet the needs of schools or of the entire student body in a school.
- Supplanting. Standards intended to assure that Title I funds are not used: (a) to replace state or local funding or previously supported programs; (b) to replace other federal funds; or (c) to provide programs in Title I schools or classrooms which are funded by state and local funds in non-Title I schools or classrooms.

On still other occasions, other funds allocation regulatory areas were addressed because of their particular significance in a given situation. These included the issues of fiscal coordination (with other federal, state, and local programs for educationally disadvantaged children) and nonpublic school participation (generally private or parochial schools).

B. Program Development Issue Areas

- Needs Assessment. Standards and activities which ascertain the educational needs of eligible schools and children and influence which of these needs will be addressed by Title I programs.
- Program Design. Standards and activities which prescribe the types of services to be offered to eligible Title I students.
- Evaluation. Standards and activities which require assessments of Title I programs and reporting of the results of these assessments to the funding agency.
- Parent Involvement. Standards or procedures which prescribe or determine the nature and extent of parental participation in the development and operation of Title I programs.

Other additional programmatic areas that were frequently addressed in these studies were in-service training for professionals or parents involved in the Title I programs and program coordination (both between Title I and other categorical programs, and between Title I and a student's regular instructional program).

CHAPTER 3

THE ANALYTIC FRAMEWORK

3.1 INTRODUCTION

The primary purpose of this study was to examine the administrative interactions and linkages in implementing ESEA, Title I between the federal government and the states, between the states and their local school districts, and between the districts and Title I schools. Our broad purpose was to determine the extent to which, and the manner in which, federal and state administrative practices can contribute to the implementation of Title I programs that fulfill federal requirements and hold the promise of being educationally effective.

This chapter sets forth an analytic framework for the discussions and policy recommendations in the balance of this report. The concepts introduced in this chapter are more fully developed and utilized in subsequent discussions on the general nature of state/local administrative interactions (Chapter 4), issue specific state impacts on local policy and practice (Chapters 5-7), federal/state administrative relationships (Chapter 8), and policy recommendations (Chapter 9). The analytic framework presented is employed in discussing similarities and differences in state and local Title I administrative policies and practices and in explaining why some states more strongly influence local administrative behavior than others.

In their simplest form, the linkages between levels of government in the administration of Title I can be depicted as in Figure 1 on the following page.

Our analysis has as its focal point, "SEA Title I Policies and Procedures." We have discovered that:

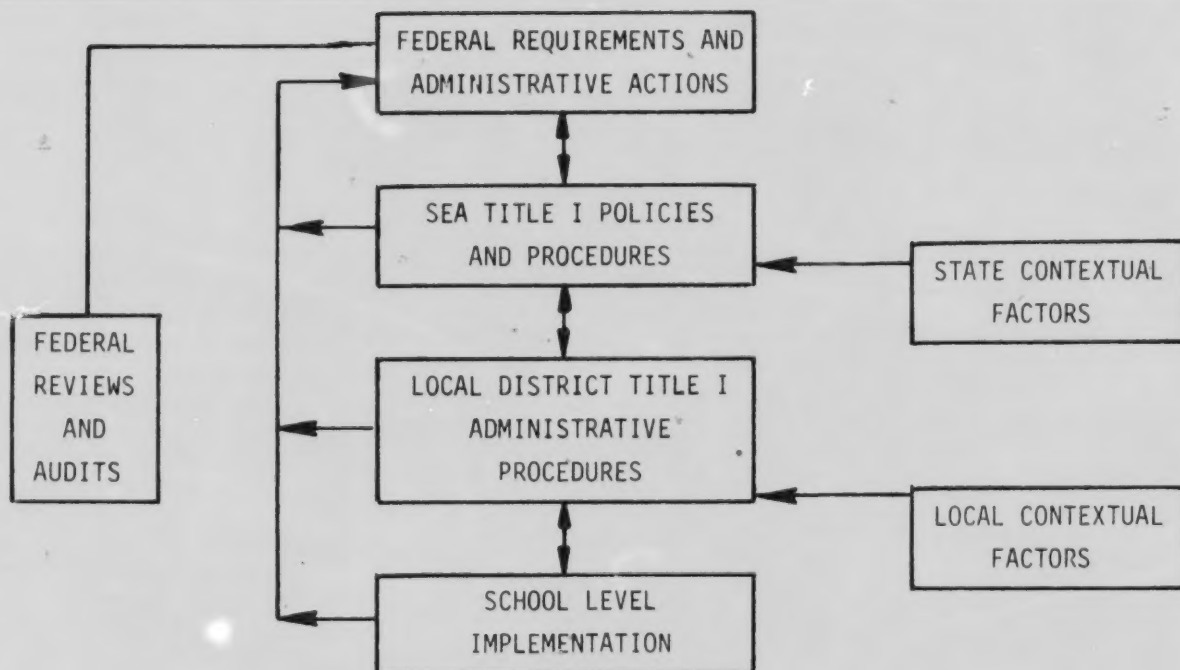


Figure 1. Intergovernmental Linkages in the Administration of ESEA Title I

The strongest factor influencing state performance in the administration of Title I is the role orientation of the SEA's Title I staff.

The analytic framework presented herein applies to the examination of the nature, source, and implications (from a federal perspective) of such state role orientations. Regarding the nature of state role orientation itself we ask:

- Is the state role orientation primarily directive or non-directive? (the *state directiveness* component of *state role orientation*)
- To what extent does the state emphasize its programmatic concerns relative to its bureaucratic ones? (the *substantive thrust* component of *state role orientation*)

Concerning the source and federal implications of state role orientations, we ask:

- Has the state defined its Title I role primarily in response to federal expectations or relatively independently of them? (*state autonomy* component)
- If the concept "state autonomy" applies, then how well do state and federal goals and means to achieving them mesh? (the *means/ends compatibility* component)

The rationale for adopting the above framework is that the ability of the federal government to influence SEA Title I administration requires an understanding of the nature of, rationale for, and implications of an SEA's role orientation. Subsequent discussions in this report thus assume the interrelatedness of the four analytic components cited above.

3.2 STATE TITLE I RESPONSIBILITIES

State responsibilities in administering Title I are as follows:

- To develop and submit a state plan to the federal government.

- To provide assurance to the federal government of intent to operate programs in compliance with regulations.
- To approve project applications from LEAs.
- To monitor local projects to assure operation of programs in accordance with plans specified in district applications.
- To establish complaint procedures.
- To submit annual evaluation reports to the federal government.
- To submit annual fiscal reports to the federal government.
- To submit funds distribution and use reports to the federal government.
- To determine subcounty allocations.
- To provide technical assistance to LEAs.
 - . To assure compliance
 - . To improve program operations.

3.3 STATE ROLE ORIENTATION: A CENTRAL CONCEPT

To understand why Title I is administered more effectively in some states than in others one must look at more than differences in activity levels and policy requirements. Inquiry must extend beyond these superficial indicators to discover the explicit and implicit messages communicated by SEAs to LEAs. This, in turn, requires an examination of different state Title I role orientations, since district awareness of a state's role orientation forms the basis for LEA responsiveness to SEA administrative initiatives.

State role orientation refers, quite simply, to:

- The level of commitment a state has in meeting its Title I responsibilities (the directiveness component).
- The state's interpretation of that commitment in terms of state program administration (the substantive thrust component).

A. State Directiveness Component

Four of the eight states visited (States A, B, C, and F) were able to have a major influence upon local district Title I activity, while in the other four states (States D, E, G, and H), state influence was much less pronounced. We categorize the former group as *directive* states, since there exists in these states a number of state policies and practices designed to direct districts to approach Title I in a particular manner and with particular thrusts. This differs significantly from the stance of the four *nondirective* states, where Title I procedures and program characteristics tend to be locally determined for the most part.

The directive/nondirective dichotomy represents one aspect of the playing out of tensions that exist among the state's roles as educational system reformer (*reformist mode*), regulator (*regulatory mode*), and unobtrusive administrator (*system-maintenance mode*). Whereas each of the eight states visited plays all three roles to some extent, in nondirective states the role of unobtrusive administrator tended to dominate state/local interactions, while in the more directive states the roles of system regulator, reformer, or both pervaded such interactions.

It is important to understand the implications of state directiveness in terms of the dynamics of state/local interaction. A state that is primarily nondirective may have an identical formal requirement to another state which is much more directive. The two states, however, will communicate different expectations for district behavior. For example, a directive state operating primarily in the reformist mode may require a narrative description of the program design process in the district application. A nondirective state operating in the system-maintenance mode may have the same requirement. A district in the first state knows that the state will pay careful attention to their program design process, and will therefore respond with a commensurate level of attention to program design. A district in the second state, on the other hand, knows that the state will pay only cursory attention to this portion of their application and will respond accordingly.

Thus, in the four directive states, local Title I activities were often undertaken with state preferences and expectations clearly in mind. By contrast, districts in the four nondirective states were aware that their SEAs refrained from getting involved in issues of local administration unless necessary for system maintenance or unless specifically invited by an LEA to do so. Districts in these states were well aware of their SEA's role orientation and were consequently much less inclined to consider state policy preferences and expectations when planning their Title I programs than districts in directive states.

It should be evident from the above discussion that critical distinctions in state directiveness cannot and were not made simply by comparing policy pronouncements or state activity levels. The ultimate criteria we adopted in assigning states to categories were whether the state had real policy preferences and high expectations for district behavior and if it was able to successfully communicate these messages to districts.

B. The Concept of Substantive Thrust

While "directiveness" is a useful concept for understanding why some states more strongly influence local administrative behavior than others, the concept does not directly address the substantive focus of state influence. Indeed, it is possible for a pair of directive states to have Title I administrative and programmatic policies that are more dissimilar than those in a given pair of directive and nondirective states.

Chapters 5, 6 and 7 explore a number of diverse state policies for major areas of state Title I responsibility. While such diversity clearly exists, certain patterns of substantive state thrust are identifiable. Five of the eight states clearly emphasize *bureaucratic* administrative responsibilities while underemphasizing *program development* (or *programmatic*) concerns. These states focus the bulk of their

resources on assuring that districts have met federal compliance standards. They may take this approach to meet system maintenance concerns (as in the four nondirective states) or to fulfill the role of system regulator (as in one of the directive states).

By contrast, three of the eight states (all primarily directive) have made a point of becoming involved in program development aspects of local Title I administration, although specific programmatic thrusts differed among these states. These were the states in which system reform was a major SEA priority. None of these three states views its role as primarily that of assuring district compliance with federal regulatory standards. In fact, two of these states have, in the past, questioned whether assuring compliance should be a significant aspect of their role.* In these states, programmatic administrative thrusts were often seen as an alternative to bureaucratic activity. That is, the states felt that their proper role was leadership to improve program quality rather than to assure regulatory compliance. In the third state, a conscious effort has been made to strike a balance between bureaucratic and programmatic concerns.

3.4 STATE ROLE ORIENTATION: ITS DERIVATIONS AND IMPLICATIONS FOR THE FEDERAL ROLE

There is a need to carefully examine both the source of current state role orientations and the implications of these roles from a federal perspective if federal policymakers are to understand:

- *Why state Title I administration operates as it does.*
- *What an appropriate future federal role might be.*

The concepts of *state autonomy* and *means/ends compatibility* are employed in this study to address these issues.

*One of these states continues to question the importance of their bureaucratic responsibilities, while the other has come to recently accept the need for a bureaucratic as well as program development role.

A. State Autonomy Concept

State Title I policies and practices are shaped by the interplay of federal requirements and state policy context. In some of the eight states, the nature of federal administrative activity had a larger influence on state role orientation (and ultimately policy and practice) than in other states, where state contextual factors tended to predominate. Four of the eight states (States C, D, E and G) oriented most of their administrative activities to federal expectations, while three states (States A, F and H) defined much of their basic Title I role fairly independently. One state (State B) had previously defined its role independently but is now oriented much more toward federal concerns.

In *federally responsive* states, most weaknesses observed in state administrative policies and practices were not areas of significant federal concern. Where such weaknesses occur in *autonomous* states, however, they often reflect independently derived state program thrusts that directly conflict with major federal program concerns. This problem of means/ends incompatibility is discussed below.

B. The Means/Ends Compatibility Concept

Prospects for a more influential federal role depend heavily upon understanding: (a) the extent to which there are basic goal compatibility problems in each of the 50 states, and (b) when there is incompatibility, whether it stems from disagreement over means or ends. In short, it must be determined whether they are disagreements over objectives or how they are to be achieved.

A state may not believe that providing extra resources to meet the special educational needs of educationally disadvantaged populations from economically deprived areas is a particularly worthwhile federal priority. They may see other goals as far more important, such as increased general assistance to local districts to meet locally determined priorities. On the other hand, a state may agree with the basic

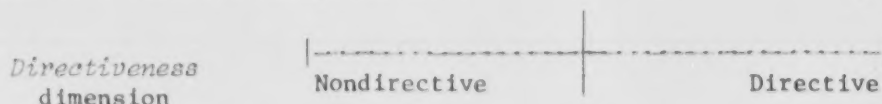
goals of Title I but disagree strongly with constraints placed by the federal government on means to meeting program goals.

If a state primarily orients its Title I program in response to federal concerns (as four of the states have), it follows that there should be no major problems of means/ends compatibility. On the other hand, if state contextual factors have played a major role in independently shaping a state's Title I effort, such incompatibility may exist. Of the three states visited that defined their roles relatively independently, one state is unproblematic in this regard. Of the remaining two, one state's goals are basically incompatible with federal goals, and the other state's means are often incompatible with federal means.

3.5 COMBINING THE CONCEPTS: THE NEED FOR A COMPREHENSIVE ANALYTIC APPROACH

Summing up, we have introduced two concepts that help explain the nature of a state's role orientation (*directiveness* and *substantive thrust*), and two others that help explain the sources and federal implications of such an orientation (*autonomy* and *means/ends compatibility*). These four concepts need to be viewed in conjunction with one another for an adequate understanding of federal/state/local relations in each of the eight states.

The above is best accomplished by viewing each concept as a dimension explaining the nature of state administrative activity. Each dimension, in turn, is best viewed in terms of a state's position on a continuum such as illustrated below for the directiveness dimension, rather than as a discrete categorization.



On the nondirective extreme of the directiveness continuum would be states that take particular pains to restrict their roles to distributing funds to districts and to avoid interfering in local affairs. On the other extreme would be states that wish to control every aspect of local administrative behavior from a strict regulatory perspective, a reformist perspective, or some combination of the two.

The other dimensions can be viewed similarly as shown below:

<i>Substantive Thrust dimension</i>		
	Bureaucratic	Programmatic
<i>Autonomy dimension</i>		
	Autonomous	Federally Responsive
<i>Compatibility dimension</i>		
	Means compatibility	Means incompatibility
	Ends compatibility	Ends incompatibility

The complexities of state administration have tended to keep the eight states from extreme positions on any of the dimensions. It is important to note, however, that there are important and meaningful differences between states that fall on different ends of the above scales. Much of the balance of this report will directly address the identification of those differences and their implications.

3.6 PLACEMENT ON THE FOUR ANALYTIC SCALES

Each of the eight case study states has been placed on the four analytic scales. Their placements are indicated below along with some of the major characteristics of the SEA's Title I effort.

State A: Scale Placement: Primarily directive; major programmatic and bureaucratic thrusts; significantly autonomous with some major means compatibility problems.

Major Characteristics: A large urban state, long concerned with compensatory education. The SEA is often at odds with federal regulations. This state emphasizes individualized instruction, in-class Title I programs, and school-level planning, implementation, and evaluation.

State B: Scale Placement: Primarily directive; major programmatic and bureaucratic thrusts; federally responsive.

Major Characteristics: A small urban state with a tradition of local autonomy. Until recently, little concern had been paid to monitoring LEAs for regulatory compliance; more emphasis had been placed on program development activities. A new Chief State School Officer has facilitated a major change in the role orientation of SEA Title I administration to achieve more of a balance between regulatory enforcement and program development activities.

State C: Scale Placement. Primarily directive; primarily bureaucratic thrusts; federally responsive.

Major Characteristics: A predominantly rural state in which state leadership has emphasized strict compliance with Title I regulations. There is little state emphasis on program development, and there are some state restrictions on local program options.

State D: Scale Placement: Primarily nondirective; primarily bureaucratic thrust; federally responsive.

Major Characteristics: A large urban state with historically weak and uncoordinated compliance monitoring. Local autonomy is paramount, with the SEA only sometimes recommending changes. One local school district is very large and politically powerful and, accordingly, will sometimes attempt to circumvent the state entirely.

State E: Scale Placement: Primarily nondirective, primarily bureaucratic thrust; federally responsive.

Major Characteristics: This is a rural state. While the SEA acts to assure that local activities adhere to minimum federal guidelines, local districts have considerable freedom in Title I program administration.

State F: Scale Placement: Primarily directive, major programmatic and bureaucratic thrusts; significantly autonomous, but without major compatibility problems.

Major Characteristics: A large urban state with a long history of compensatory education. The SEA has an experienced, dedicated staff who see themselves as striking a workable balance between monitoring for compliance and leadership in program development and evaluation.

State G: Scale Placement: Primarily nondirective, primarily bureaucratic thrust; federally responsive.

Major Characteristics: A rural state with an SEA that takes an informal approach to compliance monitoring and relies heavily on local district initiative for Title I program administration. Significant SEA attention has been devoted to providing LEAs with information on regulatory and program development areas and, recently, to developing special program models and materials.

State H: Scale Placement: Almost exclusively nondirective, primarily bureaucratic thrust; significantly autonomous with some major ends compatibility problems.

Major Characteristics: A large state with both urban and rural areas. The LEAs have traditionally had considerable local autonomy. The SEA is concerned almost exclusively with desk-monitoring and with serving as a conduit for federal funds to the LEAs. This has led to some difficulties in Title I administration from the vantage point of both federal and local officials.

Throughout the course of subsequent discussions, we use the relevant state descriptors (directive, autonomous, etc.) when addressing particular federal/state/local administrative interactions.

CHAPTER 4

STATE ROLE ORIENTATION AND ITS IMPACT ON LOCAL TITLE I ADMINISTRATIVE ACTIVITY

4.1 INTRODUCTION

In Chapter 3, the concept of *state role orientation* was defined. We noted the concept's importance in understanding why some states have a stronger influence upon local Title I administration than others. In this chapter we describe systematic differences in local Title I administrative activities and link these differences to differences in state role orientation. Section 4.2 explores the variables of *means/ends compatibility, knowledge and capacity, and state authority and its perceived legitimacy in interaction with state role orientation* and the policies and practices adopted in keeping with a given state role. Section 4.3 describes this interaction in three large city school districts. The chapter's main conclusions are summarized below:

- There are some significant means/ends compatibility problems resulting in inappropriate local administrative procedures, but none affecting the basic categorical integrity of the Title I program. Problems are most acute in nondirective states and in directive states where federal/local compatibility problems reflect the same federal/state compatibility problems.
- Adequate knowledge of Title I requirements and administrative capacity to meet such requirements are often the most critical elements in effective implementation of Title I programs. This is less likely to be a major problem in directive/program oriented states because of these states' more precise requirements and more intensive levels of involvement in local affairs.

- State authority can be used effectively and accepted as legitimate provided there is a clear state willingness to exercise authority. Such willingness has been demonstrated much more often in directive states than in non-directive states where the exercise of authority is often problematic (especially in program development areas).

4.2 STATE ROLE ORIENTATION AND ITS INTERACTION WITH KEY PROGRAM IMPLEMENTATION VARIABLES

A. The Potential Importance of Context

Many local contextual factors may influence the design and implementation of local Title I programs. Among the most important of these are:

- size and type of LEA (urban, suburban, rural);
- leadership of superintendent;
- overall philosophy of education;
- LEA managerial capacity;
- centralization versus dispersion of authority and responsibility within the central office;
- extent to which authority and responsibility are delegated to subdistricts or schools within the district; and
- specific problems or crises (e.g., desegregation, fiscal crisis).

In each of the 32 LEAs, we sought to discover ways in which these local contextual factors directly influence administration of the Title I programs and, conversely, the extent to which state expectations prevail in shaping local policy and practice. Specifically, local contextual factors may affect three critical aspects of local Title I efforts:

- Means/ends compatibility
- Knowledge and capacity
- State authority and its perceived legitimacy

In this chapter we specifically explore both the extent to which each of these variables influences local Title I implementation and how specific state role orientations interact with them in influencing local administrative behaviors.

B. Means/Ends Compatibility

Some significant problems exist, resulting in inappropriate administrative procedures, but none affect the categorical nature of the program; largest problems in nondirective states and directive states with federal compatibility problems.

1) Importance of the Variable

To what extent do administrators, teachers, citizens, and parents at the school district, school, and classroom levels accept the fundamental goals of Title I? Assuming that officials at the local level are seriously attempting to implement effective Title I programs, are their objectives the same as those of Congress and federal officials? Are they the same goals their SEA has in mind? Do local officials see Title I as a vehicle for providing more intensive educational services to those pupils most in need of such services in those schools with the highest concentrations of low-income pupils?

The extent to which local Title I goals and means for achieving them are compatible with federal and/or state goals and means is vital information needed for developing federal and state strategies for assuring compliance and implementation of effective programs. Given a high degree of compatibility, an improvement strategy might focus primarily on providing local officials with more knowledge about what is expected and how to go about meeting expectations. On the other hand,

if local goals for the use of Title I funds or procedures are seen as inherently at odds with federal or state expectations, a strategy based primarily on clarification of authority relationships and aggressive enforcement through sanctions and penalties might be more in order.

2) State/Local Interaction

The most significant problems of means/ends compatibility did not stem from a disagreement about the broad federal goal of instituting compensatory programs to meet an important need, but rather major disagreements over, or neglect of, related goals and procedures. Although major tensions exist over the priority to be given to compensatory education given other pressing district needs, even the more nondirective states have been generally successful in assuring that Title I functions as a categorical program to aid discrete target populations.

a) Directive versus Nondirective Impacts

The policies and practices of (directive) States C and F provide some vivid illustrations of how a directive state with a sufficient bureaucratic thrust can limit the potential for means/ends compatibility problems. In the largest district in State F, the Title I staff is highly committed to the principles and requirements of the program; but it receives little support from central office administration and building staff. The state field consultant for this district has been sensitive to this situation. He has thus made a point of becoming widely recognized throughout the district, with one of the effects being to enhance the authority of the LEA's Title I Director and his staff to prevent program abuses stemming from means/ends incompatibility.

Similarly, the history of Title I administration in State C over the past five years is the history of an all-out war against

local noncompliance; this has led to the building of truly categorical compensatory programs. State C's Title I office is directive, federally responsive, and oriented nearly exclusively toward regulatory compliance. To win the war, so to speak, the state deemed it necessary to exceed federal restrictions in several areas (e.g., pupil/teacher ratios, restrictions on facilities, equipment, materials, and supplies, restriction of programs to reading, math, and early childhood), and to emphasize its monitoring and enforcement role. As was the case in State F, the result of this policy has been that compliance problems due to (federal/local) means/ends incompatibility have been sharply curtailed.

In nondirective states, districts are given considerably more leeway in interpreting federal goals and specifying means to achieving them than in directive states. In addition, the state presence is usually less visible and authoritative. This situation increases the likelihood that districts will not perform in strict accordance with federal expectations. For example, educationally disadvantaged students were being served, but not always the most needy among them. Such incongruity between district behavior and federal expectations may be due to ignorance or genuine disagreement about goals or means to achieving them; and such incongruity represents compliance problems of a different order than blatant abuse of funds. In the districts visited in nondirective states, we found no instances of blatant abuse of funds but several significant discrepancies between federal expectations and district performance.

b) Special Cases

When there are major means/ends compatibility problems between the federal government and a directive state, the likelihood is great that districts in the directive state will perform in accordance with state rather than federal expectations. Such was the experience in (directive) State A where state policy with respect to the target group for compensatory services differed from the

federal government's. Districts in State A generally adopted the state policy of focusing attention and resources on entire school populations rather than individual students. This practice raised issues of possible noncompliance with federal regulations.

Therefore, although state directiveness can reduce confusion over what the federal government expects and thereby increase a district's potential for compliance, state directiveness can also have negative consequences if there exists means/ends incompatibility between the state and federal government.

C. State Authority and Its Perceived Legitimacy

State authority can be used effectively and accepted as legitimate provided there is a clear state willingness to do so; such a willingness has been demonstrated much more frequently in directive than nondirective states.

1) Importance of the Variable

When states discover inadequate or noncompliant local administrative policies or practices, there is a need for state action. There is also a need for districts to accept such involvement as legitimate if their state is to fulfill its Title I responsibilities. The concept of "legitimacy" encompasses both an overt respect for (or fear of) a state's authority to enforce its prerogatives and the more subtle acceptance by districts of the fact that the state has a legitimate and well-defined role to play in local Title I affairs.

2) State/Local Interactions

The exercise and acceptance of state authority in local administrative affairs appears to be a major issue only in some districts in nondirective states. That it is not an issue in directive states is a result of these states having made it clear to districts that the state has the authority and responsibility to insure that Title I requirements are uniformly upheld.

a) Conveying Messages in Directive States

In State C, where SEA administration became directive in 1972, the SEA Title I staff has felt the need to lean heavily on federal support and fiscal penalties to establish respect for state authority. The result has been that LEAs are as concerned today about state audit exceptions as they are about HEW audit exceptions.

State F (directive/program oriented), on the other hand, has not directly relied on the federal government to achieve legitimacy in the eyes of district officials. In the one case in this state where state authority was seriously questioned (the state's largest district), the SEA in the early 1970s conducted a comprehensive monitoring visit to the LEA and used findings from that visit to begin to force a turnabout in the district's Title I policies and practices. At the onset, the SEA listed each of the problems in local administration, specified what the LEA would have to do to correct the problems; then, instead of levying fiscal penalties for the violations, the SEA required that the application for the following school year indicate how the changes would be made. The LEA was given an additional two months to prepare its application, and the SEA made it clear that the LEA could not incur costs against its Title I entitlement until the application was approved. Although the turnabout took time (the problems were too great to solve quickly), the willingness of the SEA to use the application review process to exert its authority, while holding the ultimate threat of application disapproval and fiscal penalties implicitly in the background, proved to be a successful intervention strategy.

Similarly, the current willingness in State B to use the application review process, coupled with the delay of approval to spend against Title I funds, has been a definite signal to the largest city in that state that the requirements are now going to be enforced. For the first time in the past several years, this LEA is making important improvements in program administration.

b) Authority/Legitimacy as an Issue in Nondirective States

The use of state authority in nondirective states and its consequent acceptance tends to be more programatic than in directive states. Most of the LEAs in three of the four nondirective states seemed to accept state authority as legitimate, at least in the funds allocation areas. In fact, in the case of (nondirective) State D, the two middle-sized and one small LEA seem prepared to accept greater authority than the state is willing to exercise. We noted many instances in these districts where such authority could be put to good use. However, the largest city in this state clearly does not accept much of the limited authority the state currently exercises, responding instead only to potential federal sanctions.

The LEAs in (nondirective) State H do not expect the SEA to exert any authority; therefore, without direct federal involvement, change is unlikely to occur. In H-1, the district was able to successfully resist major state attempts to reform its program. In H-2, federal, not state, involvement is what prompted that district to institute needed changes in its administration of Title I.

c) Establishing the Legitimacy of State Involvement: Funds Allocation versus Program Development Thrusts

The LEA view of state or federal expectations for the administration of Title I is usually reflected in how they approach particular administrative responsibilities. In those areas wherein SEAs have established the legitimacy of their interests, the use of overt state authority--resorting to penalties and sanctions--can be held to a minimum. This has been most often the case in funds allocation areas, as is highlighted in Chapters 5 and 6.

Many states, however, have never sought to establish such legitimacy in program development areas. Sometimes, even specific district requests for technical assistance to improve their

program development activities are met with responses that are considered inadequate. Consequently, the overall lack of serious local attention to needs assessment, program design, program evaluation, and parent involvement in most of the districts in five of the eight states (the nondirective states and the one directive, bureaucratically oriented state) reflects the belief that neither the state nor the federal government has a legitimate and/or useful role to play in these areas.

A district's view of the importance of a requirement, procedure, or process is communicated by a state in each phase of the administrative process (application design and review, formal monitoring visits to an LEA, enforcement activities, informal contacts with local officials, and in more formal technical assistance workshops). Thus, to obtain more widespread attention to the Title I requirements at the local level, particularly those that are more complex to interpret and implement, SEAs and the USOE must communicate that those requirements are important and legitimate aspects of administrative oversight.

D. Knowledge and Capacity

Often the most critical elements in the effective implementation of Title I; less of an issue in directive/program oriented states.

1) The Importance of the Variables

Local school districts and schools must know what they are required to do in order to implement Title I programs, and they must know how to do it. Where Title I programs do not conform to federal intent, the primary reason may be lack of knowledge about what is required or lack of administrative capacity for fulfilling requirements, rather than means/ends incompatibility or insufficient regard for state authority.

Lack of knowledge at the local level about federal Title I requirements can be attributed to: (1) insufficient attention to specific details of the more complex requirements, and (2) lack of knowledge of what interpretations and rulings have been made by USOE or what program models have been developed and subsequently approved by USOE. Local knowledge may be quite adequate in some administrative areas and very weak in others. Similarly, a district may have the institutional capacity and necessary support to administer some aspects of the program, but not others.

2) State/Local Interactions

While problems of means/ends compatibility and respect for state authority explain some aspects of Title I behavior in the 32 districts, it is clear that adequate local knowledge and capacity are generally the most critical elements in the successful implementation of Title I programs. Where Title I programs do not conform to federal expectations, the underlying reason seems most often to be a lack of knowledge about what is required or a lack of administrative capacity to fulfill requirements, rather than problems of means/ends incompatibility or a lack of sufficient regard for state authority. Often, in fact, compatibility and legitimacy problems are more basically problems of inadequate knowledge or administrative capacity.

a) Knowledge

Two types of problems associated with lack of knowledge are: (1) lack of knowledge leading to locally noncompliant behavior and (2) lack of knowledge leading to overly rigid local programs. The Title I regulations are complex, and in the best of circumstances it takes a good deal of time to master them. Insufficient attention to details of the Title I regulations can lead to compliance problems or program rigidity.

Problems of Compliance

In directive states, where federal requirements are clear, the states have successfully communicated these requirements to districts (or communicated their own requirements which may be at odds with those of the federal government). Where the regulations are silent, directive states have filled the void by developing comprehensive policies and procedures to assure that the intent of the Title I legislation is met. This is not to say that there are no knowledge problems in directive states, but rather to say that what problems as do exist do not stem from any gross negligence on the part of the state.

In nondirective states, messages conveyed to LEAs through application reviews, monitoring visits, technical assistance workshops, and other modes of communication were often superficial or inconsistent. As a result, districts were frequently confused about requirements, and their level of understanding of the regulations was usually superficial at best.

In State D, for example, the two middle-sized LEAs and one small, rural LEA believe they are meeting federal expectations. Discrepancies that we noticed stemmed from their lack of knowledge of some of the finer points of the regulations--areas that had received little attention from the state, or areas where the state's messages were inconsistent and confusing. In the small LEA, the state had granted the program exemplary status but had not examined details of the program. The state, therefore, failed to note some questionable practices. Indeed, local officials assume they are running a totally compliant program. Further, our judgment was that were they informed by the state to the contrary, they would adjust their practices accordingly, as they have responded in the past.

In all districts in State D, educationally deprived students were sometimes selected on the basis of their potential to succeed. The principle of "most in need" was frequently either misunderstood or ignored. This problem can be traced to the SEAs confused understanding of the "most in need" principle, their inability to monitor that which they do not themselves clearly understand, and their disinterest in acquiring a better understanding in order to monitor this aspect of administration more closely.

Problems of Rigidity:

In bureaucratically oriented states, local knowledge problems may not result in local noncompliance but rather ignorance of legal options. For example, some local staff in State C who strongly criticized the "pull-out" service approach, were unaware that USOE and state staff had developed alternative models for "in-class" programs that could be administered in a legal manner. The overall role orientation of the state serves to de-emphasize the existence of such alternatives, thus leaving some districts with the impression that a "pull-out" model is the only compliant local program design. In other less directive but still bureaucratically oriented states, local knowledge gaps were often functions of inadequate state dissemination of alternative compliant models.

Funds Allocation versus Program Development Impacts:

In general, districts in directive states had a much better understanding of the regulations than districts in nondirective states. This is not to say, however, that there were no knowledge gaps in districts in directive states. Generally, knowledge about requirements and expectations in the funds allocation areas was more uniform and detailed across the 32 districts than knowledge about local program development responsibilities. State role orientation did serve to modify this pattern somewhat. The best understanding of program development responsibilities was to be

found in the three directive states that balanced attention to funds allocation and program development responsibilities in their communications with districts.

b) Capacity

Two distinct kinds of problems of local administrative capacity are: (1) a lack of Title I staff capability to effectively manage a Title I program, and (2) a lack of support within the LEA to effectively manage a Title I program.

Problems of Staff Capability:

The managerial capacity that characterizes each district is a critical contextual factor affecting the implementation of Title I. In a well-administered school district, the Title I program will probably also be well-run. Conversely, in a district beset with administrative problems, Title I administration will probably reflect these difficulties unless the Title I office has received special assistance.

SEA attention to district management problems has often contributed to the development of well-run Title I programs in districts not particularly noted for their effective management of local programs. Such districts tended to have capable and experienced Title I directors who were given authority and responsibility for the program by a supportive superintendent; and those directors usually managed to avoid trouble with the local education community and with the SEA. These capable local Title I directors would frequently initiate contacts with their respective SEAs in order to make sure that their program was being run in conformity with state and/or federal expectations. When Title I directors take the initiative, even the more nondirective states can have some major positive impacts on local managerial capacity.

In the few LEAs in this study where relative ineffectiveness of the Title I staff seemed at the root of a program's past difficulties, state role orientation has made critical differences in improving local management capacity. LEAs which lack managerial capability require sustained, personal attention from the SEA, particularly if local officials do not know how to go about complying with the regulations. General technical assistance/dissemination activities and superficial site visits, typical of nondirective states, are insufficient to significantly improve a district's managerial capacity.

In State F (directive/program oriented), personal attention is provided by the SEA when they observe a management capacity problem, and positive results were observed. Unfortunately, resource and time constraints lead to less intense efforts than state officials deem desirable for assuring success. In recognition of this problem, State F is planning to identify those LEAs most in need of special attention. It will then target more state resources on helping those districts achieve acceptable levels of managerial capacity (at least enough to run compliant programs). State A (directive/program oriented) has helped improve local capacity in the program development area in two of the districts visited by our team. This was accomplished through comprehensive site visit procedures and follow-up activities. In (nondirective) State D, a uniquely capable and aggressive state Title I field consultant exceeded his state-defined role and helped a district with major compliance problems markedly improve their managerial capacity.

In the 32 districts, lack of managerial capacity to fulfill most of the funds allocation requirements was not common. However, lack of capacity to deal effectively with program development areas (e.g., program design, needs assessment, evaluation, and parental involvement) was common to most of the districts. To some extent, problems

in these areas are due to lack of qualified personnel (for example, specialists in program planning and evaluation). But even in those districts that have such specialists, rarely (as we shall discuss in Chapter 7) are needs assessments and evaluations used to provide input for program design.

A common and important need, particularly in the five states that have not been oriented to program development, is to develop the capacity of LEAs to use information about the outcomes of Title I funded programs to make decisions about improving them. Similarly, many LEAs need considerable help and encouragement in developing parent advisory councils and promoting meaningful parental involvement.

Problems of Institutional Support:

While districts may have the requisite skills and expertise to administer a Title I program, they may have inadequate LEA support to do so because of specific local contextual factors. For example, the delegation of authority for important Title I decisions to subdistricts and schools is probably the most important local contextual characteristic that can affect the implementation of Title I. It can become particularly important when subdistrict decentralization or school-site management are, in effect, a predominant administrative philosophy of a district.

Small, middle-sized, and large LEAs face the same challenges in providing leadership and direction to school buildings and in monitoring program implementation at the building level as do states in their relationships with LEAs. While decentralized decision-making can certainly be consistent with both compliance and program effectiveness goals, both SEA staff and LEA central office Title I staff must recognize that such arrangements can lead to serious problems if adequate technical assistance is not provided and appropriate accountability mechanisms are not instituted.

Similarly, short-term local crises, such as desegregation or major reductions in the general district budget, can create severe pressures on the capacity of a district to run an effective Title I program. Shifts of pupils and teachers, elimination of teaching positions, and reductions in on-going programs create situations in which the integrity and the stability of Title I can be undermined.

Effective SEA administration in such crisis situations (or during critical change periods in districts) has been characterized by state awareness of the potential for problems in local administration, persistence in assuring that program requirements are fulfilled, and a cooperative, supportive relationship in which SEA staff help the LEA find workable and legal solutions to their immediate problems. For example, two of the LEAs in (directive/program oriented) State F were engaged in major efforts to provide schools with considerable authority over program decisions. The SEA field consultant for one of these districts used the advent of decentralization in the district as an opportunity to continually encourage specific administrative procedures that eventually led to a structure in which each level (central office, subdistrict and school) contributes to decision-making and is held accountable for fulfilling assigned responsibilities. In the other LEA, central office Title I officials did not obtain information from schools indicating how assigned resources would be used, and in some cases there were compliance problems at the school level. In this case, the SEA field consultant was well aware of the problem and, over time, has markedly reduced the number of school level problems in the district.*

The ability of SEAs and federal agencies to overcome characteristics of local districts that work against realization of Title I

* It should be pointed out, however, that the procedures employed by the LEA's central office staff continue to be somewhat inadequate in light of the degree of decision-making authority delegated to the schools.

goals and fulfillment of requirements has been demonstrated in other districts as well. The turnabout in Title I administration in all four of the districts in (directive/bureaucratically oriented), State C, where Title I regulations had frequently been ignored prior to 1972, and the influence of the SEA field consultant in one of the middle-sized LEAs in State D (nondirective) occurred in situations where one might expect local factors to prevail over state influences. Also, the largest LEA in State F made substantial changes in order to comply with Title I regulations and continued to improve in spite of severe fiscal crises, desegregation accompanied by large enrollment declines and staff shifts, and a less than exemplary reputation for overall LEA administrative effectiveness.

On the other hand, such local contextual factors continue to significantly inhibit the capacity for effective Title I administration in many districts in the nondirective states.

4.3 STATE ROLE ORIENTATION AND LARGE CITY SCHOOL DISTRICTS - THREE ILLUSTRATIONS

One assumption often made about state Title I administration is that when the largest urban districts are not effectively and appropriately administering Title I programs, the scale of the problems is so great that even a directive and supportive SEA cannot have much impact on the situation. This leads to the additional assumption that large city school districts, more often than not, will refuse to respond to directions from the state and will have enough power to avoid negative consequences of such refusals.

Experience during the 1970s in Districts C-1 and F-1 suggests that:

- *the large urban districts may indeed require direction from the state education agency in order to change local administration of Title I, and*
- *where the SEA is willing to provide that direction, substantial change can occur.*

On the other hand, experience during the same time period in D-1 indicates that:

- *where the SEA is unwilling or unable to exert authority, changes in local administrative practices do not occur.*

A. Two Examples of Large City Districts Where the States Made A Difference: Districts C-1 and F-1

In the early 1970s, Districts C-1 and F-1 operated local Title I programs that appeared to be noncompliant with the rules and regulations governing the federal program. Although, at the time, both districts espoused support for the broad principles of compensatory education, local implementation reflected lack of acceptance of specific program goals and lack of knowledge and capacity to implement goals. Both State C and State F exerted considerable effort to get these two large urban districts to change substantially the way they administered Title I. By the mid-1970s, both districts were operating Title I programs that conformed to federal expectations, although for the long run there are very important differences between the two cities. The nature of the problems in these two urban school districts and the different approaches used by the two SEAs provide an apt comparison of both the opportunities and the potential problems associated with state directiveness.

1) District C-1

Prior to 1972, the state education agency in State C had been nondirective in its relationships with all LEAs. In 1972, the Division of Education of the Disadvantaged (DED) of USOE visited this large urban LEA as part of its annual SEA Management Team Review. Violations of Title I rules and regulations were uncovered in the visit to C-1 and to other districts in the state. Inadequacies were cited in the SEA's application review, monitoring, and enforcement procedures. These observations resulted in a strongly worded recommendation to upgrade SEA administrative practices.

The newly appointed SEA Title I Director used the recommendations from the Management Team Review (MTR) to begin clamping down on compliance throughout the state. He requested and was granted an expansion of his SEA monitoring staff for this purpose. One SEA field consultant was assigned primary responsibility for District C-1, and the MTR findings were used by the field consultant as his starting point in bringing the LEA's administration of Title I into compliance with federal rules and regulations.

The SEA field consultant first addressed general aid violations. One of the findings was that personnel described as "lead teachers" were in reality assisting principals in administrative duties and serving non-Title I pupils. In addition, most Title I funds were being used to hire teacher aides who were apparently serving all pupils in regular classroom settings. The field consultant directed that the "lead teachers" would have to spend virtually all of their time teaching Title I pupils, that less reliance should be placed upon paraprofessional aides, and that those aides employed should be expected to work exclusively with Title I pupils. LEA officials resisted these recommendations and appealed to the state, questioning the field consultant's authority to require the changes. The SEA Title I Director and the Chief State School Officer supported the newly appointed field consultant; then district officials, finding that they were going to be held accountable to the field consultant for compliance, proceeded to follow his directives.

In 1972, having challenged the authority of the state field consultant to issue directives and having discovered that his behavior was strongly supported by the (then new) state Title I Director and the Chief State School Officer, those district administrators now fully accept the authority of state Title I officials. Such respect for the state's directive and prescriptive posture is reflected in their describing state Title I administration as uncharacteristically "good." In fact, in an attempt to run a "clean" program that avoids confrontations with the SEA, LEA officials, at times, may overreact to federal and state

directives. For example, reliance on a strict formula for student selection with no allowance for teacher judgment is far more than what the SEA and USOE require in other school districts. In fact, USOE criticized the state for allowing such rigidity in another district in the state. Similarly, the overall development of a program in C-1 that is easily administered and so clear-cut as to avoid raising questions seems to have some negative consequences. This largely one-dimensional thrust, when coupled with C-1's top-down, highly centralized management style, may have contributed to a number of tensions and negative attitudes about the Title I program on the part of teachers, principals and parents.

In conclusion, the Title I program in District C-1 currently matches the basic thrusts of the SEA: emphasis on "neat," compliant programs and minimal attention to program development concerns. Having tested the authority of the state at the outset and lost, the LEA, like others in the state has become highly responsive to SEA directives.

2) District F-1

The situation in the public schools of District F-1 in 1970 with respect to the implementation of Title I was comparable to that noted for C-1 in the 1972 USOE Management Team Review. School allocations in F-1 were unrelated to the incidence of poverty and the number of participating pupils. State F's review team noted that in some cases where two schools had virtually identical numbers and concentrations of target pupils, one school would receive twice the allocation of the other. As in C-1, funds were used for teacher aides who served all pupils in the classroom and for support services with no distinctions made between target and nontarget pupils. In addition, key program design decisions were made by central office staff who sought minimal input from schools or from the administratively decentralized regions.

The district attempted to rationalize its use of Title I funds by noting that the resources available to the regular instructional program were particularly sparse during the on-going fiscal crisis in the district and that most of the pupils in target schools needed extra help beyond what the district could provide.

With continuing pressure from (directive/program oriented) State F's Title I staff over several years, the district has completely turned around its Title I program. Befitting this state's role orientation, it applied pressure in a way that addressed not only compliance problems identified in 1970, but also program development issues, LEA managerial capacity, and the need for a greater degree of parent and school staff participation in the decision processes at the school and district level. This substantial improvement in Title I administration in the district occurred simultaneously with a shift away from the combative, antagonistic SEA/LEA relationship of the 1960s to a cooperative, professionally oriented relationship characterized by considerable informal, face-to-face contact between state and local officials.

The state's influence had much to do with the overall improvement in Title I administration in the district, though on any given issue it is very difficult to identify the exact contribution made by the SEA. Actually, the SEA's approach on the surface would seem to be anything but directive: the comprehensive management visitation to the district scheduled for the spring of 1977 was the first since 1970; the SEA assigned less than one full-time field consultant to the district; that field consultant annually conducts formal monitoring visits to only four or five of the 160 Title I participating schools; there have been no major disagreements between LEA and SEA officials, and there have been no major SEA/LEA confrontations for several years. Moreover, the pressures of fiscal crises, staff preference for Title I funded services that would spread resources more broadly than intended by the principle

of "most in need," and the district's less than exemplary reputation for educational management would lead one to expect a far different picture of Title I administration in F-1 than the one that emerges.

What, then, were the respective roles played by the state and the LEA? First, the SEA's posture in exerting leadership and direction over time, in local operation of compensatory education programs is perceived by local officials as legitimate. State officials believe that they have the authority to influence local action; they have been willing to act upon that authority, and the LEA recognizes the SEA's ultimate authority. Second, in many of the administrative areas where the district ^(and the LEA) was not fulfilling its obligations in a manner consistent with the regulations, SEA officials knew how to correct the situation, seemed to have a relatively clear conception of how the administrative pieces fit together, and began to work closely in an informal technical assistance capacity with local officials. Third, the SEA used state authority to influence the process by which program administration was improved over time and, at the same time, worked for year-to-year improvements rather than quick results.

3) Conclusion

The cases of Districts C-1 and F-1 represent two illustrations of how SEAs that are willing to provide direction to LEAs can effect a turnabout in local Title I administration from practices that failed to curb noncompliance to practices that minimize noncompliance. Given compliance with federal regulations as primary objectives, both cases are success stories. But the role orientation of the two SEAs (bureaucratic only vs. bureaucratic and program oriented) differed markedly in the two cases, and the end result reflects those differences. In F-1, the SEA's approach took into account both the problems and the opportunities that existed in the local setting, and a cooperative working relationship emerged which not only contributed to the development of a process for continually assuring attention to compliance, but also laid

the groundwork for focusing more directly on long-term program improvement. By contrast, in C-1, the SEA's style was combatant and exclusively compliance-oriented. The LEA responded with some rigid practices and a lack of consistent attention to program quality.

Taken together, the two cases of C-1 and F-1 show that state actions can make a difference in the conduct of local Title I programs, but also that improvements in compliance represent only a first step in improving the overall effectiveness of Title I program administration.

B. An Example of A Large City District Where the
State Has Failed to Make Much Difference

1) District D-1

State/local administrative relationships in D-1 provide a classic illustration of how, in a nondirective state, state influence, though often needed, can be marginal at best. This district has both the knowledge, resources and skill to bring about a unique relationship with its SEA--one in which the domain of state involvement is highly constrained. Indeed, unlike the situation with other districts visited in State D (where the state/local relationship in Title I depended very much on the personalities of regional team members and where there seemed to be no set notions of what "a proper state role" was), there seemed to be fairly clearcut ground rules operating between D-1 and the SEA Title I office. Each had carved out its own turf. Both parties tacitly agreed that only where the federal regulations were clear-cut could the state legitimately push for compliance. Where federal regulations are vague, the attitude of both parties is that D-1 staff know the regulations as well, if not better than state Title I personnel; and the SEA simply does not have the attitude, will, nor political power to enforce its interpretations over D-1's. For example, in the areas of evaluation, needs assessment, program design, and student selection, state and local interviewees were quick to point out the relatively

superior expertise of D-1's large, well-trained staff. Although state officials are discontent with D-1's practices in these areas, they feel they cannot withhold money to bring about desired changes--which is what the district has dared them to try.

Even in areas in which the state has made tentative attempts at directiveness, the lack of sufficient SEA political power vis-à-vis D-1, coupled with the savvy of the district, has often resulted in long, drawn-out battles in which the district has usually delayed if not entirely avoided changing its behavior. For example, two years ago, an SEA program review visit uncovered faulty student selection procedures in the district's popular program involving parent-child centers, and the state monitor publicly announced that practices were contrary to federal regulations and must be changed. Needs were now supposed to be determined yearly, and "most in need" children were to be given priority. In follow-up conversations, the state Title I Director backed off this position somewhat and asked the district's Title I staff merely to remove from the program children reading above grade level. He did not ask them to give priority to those "most in need."

The initial local response was to fight the state ruling. The city-wide Title I Parent Advisory Council was brought into the fray to urge parents with children in these Centers to write to the President and their Congressmen asking them not to "kill" the Centers. A bill was even introduced in Congress that would specifically allow D-1 to maintain its selection procedures.

In the meantime, the state Title I Director, in a rare attempt at directiveness, ordered the district to produce a needs assessment with clear, acceptable criteria for yearly selection of educationally deprived children and threatened that if this recommendation were not heeded, D-1's next application would not be approved. The district then established eight cognitive and affective criteria. As long as any student failed to meet any one of them, he/she could remain in the program. The state

returned the submission to the district saying that it was unacceptable. Promises were made by the district that the matter would be reviewed further in the future. The state then went ahead and tentatively approved the FY '77 application.

2) Conclusion

The above illustration is indicative of several "David and Goliath" battles between the nondirective State D SEA and the powerful and resourceful D-1 LEA. Since this district fails to recognize or respect state authority in all but the most clear-cut areas, some additional federal support may be needed to enhance the state's role and shorten its odds for effective administrative impact. The state needs to be perceived in D-1 as having "clout" if it is to influence local administrative policies and practices. Achieving this seems to require that the federal government help the SEA establish its authority by making it clear to D-1 that: (1) the state has legitimate authority for Title I oversight, and (2) the state not only can but must, when necessary, exercise such authority in fulfilling its obligations to the federal government. The state would then have to develop both compatible state policies and practices that attend to details in fulfilling federal guidelines and demonstrate a willingness to apply sanctions, where needed, to assure compliance. Some specific recommendations for achieving these ends are presented in Chapter 9.

CHAPTER 5

SPECIFIC STATE POLICIES, PRACTICES AND IMPACTS: KEY MANAGEMENT AREAS AND INTERNAL ORGANIZATIONAL STRUCTURES

5.1 INTRODUCTION

One of the goals of our study was to analyze and assess the impacts of specific aspects of state administrative policy and practice on local administrative activity. This chapter presents our conclusions about the impacts on districts of state approaches to four key aspects of Title I management (application approval, technical assistance, compliance monitoring, and regulatory enforcement) and to state administrative organization.

While these findings may prove quite useful to state and federal policymakers, we do not advise that they be interpreted as rules for assuring effective state Title I management. As indicated in Chapter 3, we found state impact to be a complex phenomenon which is fundamentally a function of the overall messages communicated by an SEA to an LEA in interaction with local contextual variables. The content of messages and how they are communicated are, in turn, functions of the basic role orientation of the SEA. Certain management approaches and internal organizational arrangements may facilitate more effective communication of certain messages, but by focusing only on such approaches and arrangements, more basic and significant underlying problems can be overlooked. Thus, our warning is to be wary of magic formulae that claim to maximize state organizational effectiveness through requiring all states to engage in particular types of management activity or to organize around certain structural principles.

Conclusions about the impact on local activity of specific state organizational and management approaches are as follows:

Conclusions: Internal Administrative Organization

- State organizational arrangements are often a function of state role orientation.
- More effective state administration was generally associated with the following internal organizational characteristics:
 - . Frequent and dynamic SEA/LEA face-to-face interaction;
 - . A convening of Title I program authority and responsibility in one office;
 - . Field consultants having administrative responsibility for only Title I and related categorical programs;
 - . A "holistic" and comprehensive, rather than fragmented and unidimensional, administrative focus on the part of state Title I staff.

Conclusions: The Application Approval Process

- States uniformly use the process to certify local compliance with minimum federal standards.
- The process works best and rather effectively in getting districts to focus attention on most of the funds allocation requirements.
- The process is generally less effective in getting districts to devote attention to the more complex aspects of the funds allocation requirements and to program development concerns.
- Some states use the application document as a major tool to meet state specific objectives and priorities as well as federal objectives.
- The impact of a state's application submission process on local activity is heavily dependent upon what other state administrative activities accompany the process (application follow-up, on-site monitoring, technical assistance, etc.). Such accompanying activities are especially important in rural districts. The level of effort on such accompanying activities was much greater in the four directive states.
- The content of the application document itself may be a misleading indicator of state/local administrative relationships. Informal and subtle messages concerning state expectations may have more influence on local activity than formal requirements.

Conclusions: Technical Assistance, Monitoring and Enforcement

- The eight states' technical assistance, monitoring, and enforcement efforts generally focus heavily on funds allocation requirements and, hence, have greater impact on local practice in that area than in program development.
- Some major variations in state practice in technical assistance, monitoring, and enforcement were encountered. Those that seemed most significant in terms of affecting local activity were the following:
 - . The frequency and emphasis placed on state monitoring visits;
 - . Adequate follow-up of state monitoring visits;
 - . The thoroughness of the monitoring visit;
 - . The coordination of state monitoring and technical assistance activities, preferably through the same person or organizational unit;
 - . Intensive, on-site technical assistance visits, especially for rural areas;
 - . Threats of state sanctions for noncompliant activities.
- Directive states placed greater emphasis on their management responsibilities than nondirective states, though specific state management approaches are largely functions of a state's substantive thrusts as well as directiveness.
- As with the application process, the existence of particular administrative practices in a state by no means guarantees a positive impact on local activity. No state practice should be evaluated in contextual isolation. Rather, specific state activities must be viewed in conjunction with other important aspects of a state's Title I effort, as well as local district needs.

5.2 STATE ORGANIZATIONAL STRUCTURES FOR TITLE I ADMINISTRATION

A. Focus of Our Research

As indicated in Chapter 1, three major types of structural characteristics were explored in the eight case study states.

- The existence of centralized versus dispersed Title I authority within the SEA.

- The existence of regional Title I offices.
- The existence of separate technical assistance and monitoring units within the Title I program.

We were particularly interested in two questions about state structural variations:

- Why do states have different Title I organizational structures?
- How do differences in organizational structure affect the nature of state impact on local administrative activity?

B. State Organizational Arrangements as Reflections of State Role Orientation

States tend to develop internal organizational structures that facilitate Title I administrative approaches consistent with one or more aspects of their basic role orientation. For example:

- In State A (directive/program oriented), the dispersion of Title I staff throughout the elementary and secondary education unit reflects that state's emphasis on Title I as one component of a compensatory education thrust geared to improving the environment of entire schools.
- In State H (nondirective/goal incompatible), the bulk of the Title I staff is located in the SEA's fiscal unit, and they work primarily on certifying "paper compliance" through the application approval process for Title I and other categorical programs.
- In State B (directive and recently more bureaucratically oriented), the latest reorganization and redefinition of Title I responsibilities for Title I staff reflected an effort by that state's Chief State School Officer to establish more direct control over a Title I unit that has historically been autonomous and largely unresponsive to SEA thrusts.
- In State B (nondirective), both the rigid separation of monitoring from technical assistance responsibilities and the lack of clear line authority from the Title I director to his regional staff indicate this state's lack of directiveness in Title I.

C. Structural Characteristics Can Make a Difference in State Administrative Effectiveness

Some Title I organizational structures showed greater promise for effective Title I administration than others. The following four conclusions are especially noteworthy.

- 1) *The more frequent and dynamic SEA/LEA face-to-face interaction, the greater the state impact on local administration.*

This kind of interaction was a rarity in the eight states. When it occurred, however, it enhanced state impact on local behavior. Major state impacts were noted when state oversight was not superficial or exclusively formal. A regionalized state structure can obviously facilitate (though not, of course, guarantee) such interaction. The directive states generally give more emphasis to frequent and dynamic SEA/LEA relationships than the nondirective states, although weaknesses in the extent or quality of SEA/LEA interaction were noted in some districts in directive states as well.

- 2) *Title I program authority and responsibility should be convened in the same office.*

In one nondirective state (State D), this principle has not been followed. The result is a highly fragmented administrative operation resulting in inconsistent, confusing, and sometimes contradictory messages from state officials to LEAs.

- 3) *Title I field consultants should not have major administrative responsibilities for other non-related categorical programs.*

In two of the nondirective states (States D and H), many Title I staff did have major responsibilities in other than compensatory education programs. This generally weakened the ability of these personnel to keep up to date with all pertinent Title I regulations and interpretations and to focus on problems unique to the Title I program.

- 4) *In their interactions with local districts, SEAs need to adopt holistic, comprehensive approaches to administration rather than unidimensional or fragmented administrative approaches.*

Unidimensional administrative approaches have characterized the operations of State C (directive/bureaucratic) and State B (directive/exclusively program oriented prior to a recent major restructuring). As would be expected given their role orientations, State C organizes the bulk of its their administrative activities around compliance monitoring, while State B (until recently) organized its administrative activities around the state's technical assistance function. The result has been local programs in both states that have emphasized certain functional concerns (such as producing a quality evaluation report) at the expense of others (such as insuring that the pupils most in need are selected for the program).

State D (nondirective) has recently separated technical assistance from monitoring and enforcement responsibilities. Separate organizational units with different staff are responsible for each function. Our observations in State D and in other states led us to conclude that these two management functions need to be highly integrated. Separating the roles and assigning them to different individuals makes such integration difficult to achieve and is, thus, an inefficient and counter-productive practice. For example, one district in State D informed us that they will request less state technical assistance now, because state personnel rendering such technical assistance will no longer be approving their application and monitoring their district for compliance.

5.3 STATE APPROACHES TO KEY MANAGEMENT AREAS--APPLICATION APPROVAL, TECHNICAL ASSISTANCE, MONITORING, AND ENFORCEMENT

A. Application Approval

1) General State Approaches and Their Impact

All eight states use the application document as a major vehicle for certifying compliance with minimum federal standards. By requiring districts to submit annually, in writing, such items as lists of participating schools and explanations of why they qualify for funding; broad descriptions of program components; methods of student selection; etc., the document functions to communicate state program expectations and concerns. In general, the state concerns that are expressed most effectively through the application process relate to funds allocation (school eligibility, school selection, student selection, concentration of effort, supplanting/general aid, etc.). This is because compliance with most of the requirements in these areas can be documented rather easily on the application form. Knowing that funds allocation issues were important concerns of their states, nearly all of the 32 districts tended to devote most of their resources to assuring compliance in these areas and to documenting such compliance on the application form. By contrast, the greatest weakness in the application approval process was in its marginal impact on local activity in some of the more complex issue areas (chiefly aspects of student selection, avoidance of supplanting and general aid, and in all the program development areas,; i.e., needs assessment, parent involvement, program design and evaluation). An elaboration of the funds allocation/program development improvement dichotomy will be more fully developed later in this section.

2) Major State Variations

Major variations in the content of the application form were generally in areas of state concern that went beyond the meeting of a minimum federal requirement. State E, for example, is a nondirective state that is currently attempting to more highly emphasize their program development role.

They have therefore required that districts applying for amendments to their budgets certify in their application how that money will be used to help the plan for the following year's program. State A's requirement of detailed school-level applications, with an emphasis on program development concerns, reflects the directive/programmatic thrust of this state's Title I effort. State B (directive/program oriented) is concerned with meaningful local needs assessment activity. This has led the state to require that a district detail, in the application document, each step it will undertake in the needs assessment process.

The value of these expanded requirements for improving local administrative Title I activity in these states may be quite limited, however. For example, while detailed school level application requirements have definitely influenced more rigorous and systematic attention to program development concerns in three of the districts in State A, this was not the case in the state's rural district. Here, the application submission process was viewed by most of the schools as an administrative chore to be completed quickly and with little attention to substance.

It is significant that the above mentioned rural district was one that has not been subject to recent state Title I site visits. This highlights the important general finding that *if the application process occurs in a vacuum, state impact is minimized. If, on the other hand, the application process is coordinated with other state administrative activities (such as prior and subsequent monitoring, technical assistance, and frequent SEA/LEA contacts), state impact is significantly increased.* Such coordination is especially important in smaller rural areas where general isolation can significantly limit a district's knowledge and capacity to deal effectively with Title I administration and the implementation of effective Title I programs.

The coordination of the application approval process with other aspects of state activity occurs most frequently in directive states. For example: (a) State F is the only one of the eight states to use district evaluation reports as source documents in judging the acceptability of local applications; (b) one of the express purposes of State A's detailed application form is to guide state monitors in their site visits; and (c) districts in State C are aware that everything stated in their application form will be monitored on-site for accuracy during the course of the year.

Because the impact of the application document cannot be assessed without examining other aspects of the state/local relationship, the content of the document itself can be a misleading indicator of state administrative input. For example, one should not infer that: (a) if there appears to be nothing outstanding about the application form, the state impact on local activity is not substantial, or that (b) if a state requires districts to certify the meeting of minimum federal requirements on the application, districts know that the state is concerned with assuring local compliance.

On balance, we could probably say that the above two relationships do exist in a majority of cases. However, experiences of State F (in which a typical application document belies an atypically high level of state/local interaction relationship in Title I) and State H (in which districts are aware that attention to the application document is about the extent of state concern with assuring local compliance) show us that the application document alone can be an inaccurate indicator of state activity. In both of these states, the requirements on the document itself do not reveal the underlying message reflecting the role orientation of the SEA. The message in State F (directive/program oriented) reads, "We are concerned about how you deal with the program development components of the application" while in State H (nondirective/incompatible) it reads, "Fill out this form the way we want to see it and chances are we will not bother you again this year."

B. Technical Assistance, Monitoring and Enforcement

1) General Patterns

States tend to differ rather significantly in their approaches to these management areas. Despite such variation, however, a few important general patterns emerge.

- In technical assistance:

- . All states hold some technical assistance workshops and conferences annually.
- . All states feel comfortable in rendering technical assistance to address funds allocation questions. Some states are decidedly less comfortable, however, in giving technical assistance in program development areas.

- In program compliance monitoring:

- . All states do some on-site monitoring. All except one state (State H) try to visit each district at least every three years. Larger districts are visited more often than smaller ones.
- . Monitoring in most states tends to focus on funds allocation concerns, since they are less controversial and easier to investigate.

- In enforcement:

- . Sanctions are generally not applied by states. Warnings of sanctions are somewhat more common but are still very infrequent.
- . When sanctions and sanction warnings are imposed, they are invariably in the funds allocation areas.

The general patterns cited above all tend to point toward greater state effectiveness in insuring local attention to funds allocation procedures than to program development activities. Although state levels of effort do differ markedly in these management areas, nearly

all of the 32 districts were more concerned over how the state would view their policies and practices in the funds allocation areas than in the program development ones.

2) State Variations

Some important and meaningful state variations in management activity are summarized below:

- 1) *In general, the more frequent and highly emphasized the state monitoring visits, the greater the state impact.*

Frequent visits of state officials to districts are a most important factor in explaining state impact. (Directive) State C provided the most vivid example of the potential impact of such direct contact. Because districts knew they were being monitored by the state annually and would be held accountable for their actions, they took great care in responding to state concerns. The opposite situation was found in (nondirective) State H, where the usual absence of on-site state monitoring led locals to ignore the state except when submitting their Title I applications.

- 2) *State follow-ups of monitoring visits are very important.*

Monitoring visits followed by written reports (for filing at the SEA level) and by letters and commentaries to the LEAs are generally useful only when the SEA lets the LEA know precisely what it expects them to do as a result of their visit, and the state subsequently ascertains what in fact was actually done. The absence of such follow-up in (nondirective) State D has severely limited the impact of monitoring visits in this state. Extensive, well-coordinated follow-up activities are a key to the generally effective state impact in (directive) State F. In fact, such follow-up activities obviate the need in this state for more frequent comprehensive state monitoring reviews.

- 3) *The questions raised or level of data sought are important in the monitoring process. These should not be superficial or so formalized (check-list types) that they do not permit a thorough understanding of what is actually taking place.*

Superficiality was a problem with many state monitoring efforts. Two significant exceptions were in States A and F (directive/program oriented) where more comprehensive monitoring has led to some substantial state impacts especially in program development areas. The most generally effective monitoring efforts encountered were those in which teams of field staff (at least one of whom was thoroughly familiar with the local program) spent a few days in the district interviewing LEA staff, principals, teachers and parents, observing program operations, and reviewing relevant documents. Single-person, single-day site visits can serve to successfully augment more infrequent comprehensive site reviews, especially in the funds allocation areas. However, such visits should not be considered substitutes for more comprehensive monitoring sessions.

- 4) *Coordinating technical assistance with monitoring at the same time or through the same visit results in greater state impact. It is also more effective when the same people do both.*

Some impressive examples of monitoring/technical assistance coordination were discovered in States D and F. In these states, state consultants worked with district officials to find ways to solve local compliance difficulties while still meeting locally perceived needs and concerns. When this type of input is working at its best, a state official will deal with a local compliance difficulty by saying, "you can't run the program in this manner, but here are some alternative procedures that would be both compliant and responsive to your concerns."

Paradoxically, the recent decision in (nondirective) State D to rigidly separate technical assistance from compliance monitoring

severely weakens what seemed to be the major potential strength of that states' administrative program. It is argued by state officials here that LEAs will respond more effectively to recommendations from the SEA if the spectre of authority or the threat of sanctions for not heeding the recommendations is removed from the interaction. What State D has failed to realize is that in administering a categorical program such as Title I, local officials are primarily motivated by a need to avoid problems, and they can avoid problems regarding compliance and the meeting of state expectations most effectively by communicating directly with the individual(s) in the SEA responsible for regulatory oversight of their district. Our findings consistently suggest that when local officials want assistance in meeting requirements--and our understanding of the technical assistance currently provided is that it is almost exclusively geared to requirements--they prefer the kind of direction that helps them comply, and they prefer to receive it from the individuals who are going to hold them accountable for compliance.

- 5) *On-site visits are necessary for major state technical assistance impacts. The more frequent and in-depth these visits (i.e., the less superficial or routinized), the better.*

The importance of direct SEA/LEA interaction is again highlighted by this finding. Technical assistance booklets and regional state conferences, workshops, etc., were generally found to be of limited usefulness (especially for smaller rural districts) when not undertaken in conjunction with a more direct and personal form of state guidance. Similarly, telephone assistance can be very useful in simple funds allocation matters and as a follow-up to site visits. It is inadequate, however, as a primary technical assistance vehicle. The most personal dynamic and in-depth technical assistance activities were found in (directive/program oriented) States A, B and F. Local administrative improvements, especially in the program development areas, were directly related to state technical assistance efforts in many of the districts visited in these states.

- 6) *The threat of state sanctions for local noncompliance can have a critical impact on the nature of local administrative activity.*

The most vivid examples of the potential impact of sanctions are in directive States B and C. State B's recent warnings to districts that it will disapprove noncompliant applications and hold back payments has proved a successful strategy in inducing districts to take regulatory compliance concerns more seriously. In State C the relatively frequent threats and impositions of sanctions for noncompliance have further reinforced local responsiveness to state concerns, especially in the heavily monitored funds allocation areas.

5.4 STATE DIRECTIVENESS AND UNIFORM MANAGEMENT PROCEDURES

As can be seen from the above discussion, directive states as a whole have more effective management practices than nondirective states. However, the specific nature of a state's management efforts are functions of a state's substantive thrust(s) as well as its degree of directiveness. For example, both State C and State F have approached their monitoring responsibilities in ways which tend to maximize state impact. However, the specific approaches of these two states differed. State C (directive/bureaucratic) emphasizes assuring strict local compliance, fearing that anything less than extensive attention to this effort will result in local noncompliance. The state, therefore, conducts annual formal monitoring visits of all districts with frequent spot checks in between. The visits focus entirely on regulatory concerns. State F, on the other hand, devotes less effort than State C to assuring strict regulatory compliance and more effort to program development issues. Their approach to monitoring thus consists of fairly infrequent but comprehensive site reviews of all local program operations (funds allocation plus program development) with considerably less comprehensive telephone and spot-visit follow-ups.

Both approaches cited above clearly have their strengths and weaknesses and reflect the different substantive thrusts of these two directive

states. As will be seen in Chapters 8 and 9, the federal challenge is not to insure that these state approaches (and role orientations) look alike, but rather that they are appropriate given unique state contexts and local district needs.

5.5 MANAGEMENT PROCEDURES AS LIMITED DETERMINANTS OF STATE ADMINISTRATIVE EFFECTIVENESS

The above discussion leads us to reiterate a point made in the introduction to this chapter: although state management policy and practice can indeed make a difference in the degree of state impact on local activities, this does not mean that requiring states to incorporate particular management procedures will assure state effectiveness. As with the application process and internal structural arrangements, discrete monitoring, technical assistance, and enforcement activities do not occur in a vacuum; rather, all interact in a unique context. Specific state administrative policies and practices are elements of the relationship between SEAs and LEAs but, viewed individually, they tell you nothing about how or why a particular state assures (or fails to assure) compliance with its mandates.

For example, upon first visiting (nondirective) State D, we were quite impressed with the sophisticated and seemingly comprehensive state monitoring system, as reflected in such things as the content of their monitoring instrument, the manpower assigned to monitoring, and the frequency of informal site visits. Only upon further detailed investigation at the state and district levels did we discover the following:

- The monitoring structure was actually loose and uncoordinated. Title I field staff were not obliged to monitor informally. Title I field staff were not accountable to the state Title I Director. They operated out of another department. Recommendations of monitoring were usually not followed up to determine if they had been heeded.
- Many regulatory areas were typically covered only superficially because of no overt evidence of noncompliance and a belief that because districts wanted to run a compliant, quality program, they were, in fact, doing so.

- Districts were aware that the state did not want to take an aggressive posture with them on certain issues. As a result, districts might very well delay, resist or ignore implementation of some state recommendations for program change, while continuing to maintain an overall cooperative relationship with the state.

The above example is not meant to imply that this state's monitoring efforts had no effect on local behavior nor that programs in this state were generally noncompliant. It is meant to emphasize the point that the degree of impact could not be at all accurately gauged or predicted by looking only at isolated and superficial indicators of the size and scope of this state's monitoring efforts.

In conclusion, although specific management activities can make a difference for administrative effectiveness, the impact of recommending or requiring discrete and specific management changes can be a limited one. In addition, interpreting the existence or absence of particular management characteristics as reflections of Title I administrative effectiveness is too simplistic an approach. The nature of these activities must be viewed very carefully and only in conjunction with other important aspects of a state's Title I efforts and local district needs.

CHAPTER 6

SPECIFIC STATE POLICIES, PRACTICES AND IMPACTS: THE FUNDS ALLOCATION AREAS

In this chapter we examine specific implementation patterns and problems associated with the funds allocation areas of the Title I regulations. These are:

- *School selection*
- *Allocation of resources to schools*
- *Concentration of effort*
- *Student selection*
- *Avoidance of general aid and supplanting*
- *Comparability*

Particular attention will be given to exploring both SEA policies and SEA administrative practices when these factors seem related to how LEAs have implemented Title I.

6.1 GENERAL STATE PATTERNS AND THEIR IMPACT

A. The Nature of State Impact

The integrity of the Title I program begins with assuring that programs supported by federal funds get to the schools and pupils for which they are intended and that services provided by these programs represent an additional resource for each child's education beyond what the state and local district provide for all pupils.

Probably the major general accomplishments in state management of Title I since the early 1970s have been in the implementation of policies and procedures to assure attainment of many of the program's key funds allocation goals. Positive state impacts are most evident in allocation issues requiring primarily district-, as opposed to school-level

administrative activity: school selection, allocation of resources to schools based on relative need, concentration of effort, and comparability. Some positive and increased state impact can also be observed for student selection procedures and the avoidance of general aid and supplanting. However, the more complex nature of these latter areas, plus the need for districts to actively monitor school level activity to insure compliance, has resulted in considerably more local variation here than in the other funds allocation areas. The most problematic local compliance issues are pupil selection based on the "most in need" principle and understanding what constitutes "supplementary" services and the avoidance of general aid.

B. Explanation of State Impact

A combination of factors has contributed to states playing a major and generally effective role in the funds allocation areas.

- 1) *The importance of the funds allocation requirements has been communicated, at least to some extent, by each of the SEAs. States have communicated, through administrative actions, that certifying compliance with these requirements is an important local responsibility.*

What little directiveness exists in the nondirective states is focused on basic funds allocation issues. In addition, the three program-oriented states each devote some attention to the more bureaucratic funds allocation concerns. As will be detailed in Chapter 8, the HEW audit process has been a major influence in this area.

- 2) *Most of the funds allocation requirements are relatively straightforward and easy to administer at the local level.*

LEA officials can readily understand the intent of most of the federal and state requirements in the funds allocation areas, particularly for those decisions that are made at the district rather than the

school level. Local attention to these areas is viewed largely as a technical management function. Once administrative techniques are established, procedures become routinized and, often, isolated from program development concerns.

- 3) *Most of the funds allocation requirements are relatively easy to monitor by the SEA.*

As indicated in Chapter 5, incentives for LEAs to comply were increased by LEA awareness that many of the key allocation requirements can be monitored by the SEA without major difficulties, particularly during the application process. The exceptions are the general aid, supplanting and student selection requirements that SEAs find among the most difficult to monitor. For LEAs to be noncompliant in the areas of school selection, allocation of resources to schools, concentration of effort and comparability would usually require a conscious local effort to directly contradict in action what had been certified on paper. Recognition of the legitimacy of the state role (in funds allocation areas) or fear of SEA or federal reprisals made such local deception exceedingly rare in the 32 LEAs.

- 4) *Technical assistance for improving administration of the funds allocation requirements is available from SEAs.*

As highlighted in Chapter 5, states have, through technical assistance, improved local district techniques for fulfilling the funds allocation requirements. Even nondirective states that, in general, prefer to play an unobtrusive role in local affairs feel quite comfortable in offering aid here, since giving assistance in these areas which require mere "technical" upgrading is not viewed as interference in local affairs.

- 5) *States have, for the most part, encouraged or required LEAs to provide only those program services with a low potential for noncompliance with the funds allocation requirements.*

Almost all of the 32 LEAs devote far smaller proportions of Title I resources to peripheral subjects, support services, after-school and summer programs than was the case in the early 1970s. Many LEAs provide services that are largely "pull-out" rather than "in-class" in nature. Such changes in program design seem to be motivated as much by concerns over compliance as by increased focus on basic skills. The elimination of program designs with a high potential for noncompliance (if not carefully administered) has been the principal technique for addressing the "avoidance of general aid and supplanting" requirements.

C. Remaining Problems

The overriding message of the above points is that LEAs consider their responsibilities in the funds allocation areas to be significant, relatively clear-cut, and a function of local managerial capacity. Their job in these areas is often seen as analogous to smoothly managing a payroll or balancing an account ledger. Where important problems still remain in attaining minimum standards in the implementation of the funds allocation requirements, both in general and in the case of specific LEAs, these problems can be attributed to:

- Generally poor school district management, particularly in terms of assuring school-level accountability.
- The relative complexity of the "pupil selection" and the "avoidance of supplanting/general aid" requirements and the difficulty in monitoring them at the school level.
- Lack of means/ends compatibility between issue specific federal and/or state expectations and local preferences, such as with the "most in need" principle.
- State failure to thoroughly monitor these areas and/or philosophical objections of states to the relevance of particular requirements.

Assuring student selection in accordance with the "most in need" principle and avoidance of supplanting/general aid are among the most

significant barriers to generally compliant local implementation of Title I. There are three major reasons for district-to-district variations in practices in these areas: (1) lack of local concern with strict compliance because of lack of clear state policies and weak state monitoring procedures; (2) genuine local confusion over what constitutes compliant local behavior; and (3) genuine belief that local policy interpretations in these areas are perfectly compliant. The latter belief is sometimes reinforced by state policy pronouncements and during state monitoring visits. We should emphasize, however, that even in these areas, compliance problems seldom represented full-scale subversions of the regulations. Rather, they represented variations in attitude regarding how strictly these regulations should be interpreted.

6.2 SPECIFIC NATURE OF STATE AND LOCAL ACTIVITY FOR EACH FUNDS ALLOCATION ISSUE AREA

The major findings highlighted above are further elaborated in this section through separate discussions of funds allocation issue areas. The issue areas will be discussed in the following order: school selection, resource allocation to schools, concentration of effort, student selection, supplanting/general aid, and comparability.

A. School Selection

Generally systematic state and local procedures that conform to requirements; compliant variations with political implications.

Determining which schools will receive Title I resources is viewed as a relatively straightforward administrative procedure in each of the states and LEAs visited. Unlike some other funds allocation requirements that allow little local policy leeway if the district is to be compliant, federal requirements in the area of school selection give districts policy options regarding: (a) the poverty indicator(s) to be used to identify and rank eligible schools, and (b) the number of eligible schools that will participate in the Title I program.

1) State Policy and Practice

This area was administered in a fairly uniform manner in each of the eight states. States understood the requirements and conveyed that understanding to their school districts. Major variations are in the extent of compliance monitoring activity through application review and on-site monitoring. For example (directive/bureaucratic) State C checks the accuracy of local school eligibility calculations during their monitoring visits, since an HEW audit revealed that one State C district was submitting inaccurate data. Conversely, in (nondirective/goal incompatible) State H, a similar HEW audit finding has not resulted in any change in this state's level or intensity of monitoring activity. Even State H, however, makes sure that district applications reflect compliant school selection policies.

2) Local Policy and Practice

Because of the school selection options available to districts, there were some important variations in local policy for school selection despite the fact that state policy and practice was markedly similar in the eight states. The choices within the boundaries of the requirements leave considerable room for local priorities to influence which schools will receive Title I funds. When not all eligible schools are served, whose priorities are met becomes a political issue.

LEAs are required by states to identify and rank eligible schools according to a single poverty indicator or index of several indicators. Those schools above the poverty index average for the district are eligible to receive Title I services. Poverty indicators can vary markedly in their ability to accurately reflect the current poverty conditions of different population groups (Blacks, Hispanics, etc.), as well as in their availability and reliability. Besides using poverty indicators to determine Title I school eligibility, poverty indicators are also required to indicate which eligible schools will participate in a district's Title I program. The poverty "rankings" of

schools are crucial in some districts because high ranked eligible schools are served first. Low ranked schools may be legally excluded.

The choice of poverty indicator(s) may thus affect: (1) how much year-to-year stability in participation and funding will be maintained versus responsiveness to changing local conditions and needs, and (2) whether schools serving different groups of low-income pupils will be served.

In most of the districts visited, a single poverty indicator is used for convenience, and all eligible schools participate in the Title I program. However, many of the larger LEAs do not fund all of their eligible Title I schools, making the choice of indicators a sometimes volatile political issue. Many of the larger LEAs use a combination of 1970 census tract income data and AFDC or free lunch, adjusting the relative value of each factor annually in order to strike a workable balance between stability and responsiveness. Two of the large cities are experiencing conflict over choice of the factors to be used in ranking schools because representatives of schools serving predominantly Hispanic areas claim that heavy reliance on welfare data understates their need for Title I services, since "Hispanic citizens are less likely to apply for welfare than are Blacks." In both cities current formula factors seem to favor schools that are predominantly Black over those that are predominantly Hispanic. Hispanic representatives in these cities would prefer use of a test score criterion in ranking schools.

3) Summary

Significant variations in local policy in this area are not due to state policies and practices which are fairly uniform and effective (from a compliance perspective). They are due, rather, to specific local factors. In the large urban areas, there is a greater tendency to not serve all Title I eligible schools so that funds are sufficiently

concentrated to assure program effectiveness. This decision, in turn, makes the choice of an appropriate poverty indicator exceedingly important. What in most districts is a mechanical procedure, the goal of which is to employ the most accessible data, is in some large urban districts a political issue and one that must take into account educational, administrative and equity considerations.

B. Resource Allocation to Schools

Not generally an area of state concern. There are two distinct local patterns with different implications for compliance issues.

Once eligible schools have been identified, school districts must allocate resources to participating Title I schools. Only two of the eight states visited appeared particularly attentive to local procedures for allocating resources to schools. Districts, in turn (in the six other states), approached this issue in one of two broad ways, depending on local contextual factors.

1) State Policy and Practice

Only (directive/program oriented) States A and F have explicit policies and practices designed to insure that school resource allocations are systematic and related to needs. State A requires that district allocations to schools be made on a formula basis reflecting economic and educational deprivation. After districts rank each eligible school by economic criteria (to determine which schools will receive their allocations first), they must allocate between \$350 and \$550 for every pupil in the first ranked school reading below the 25th percentile. The process then continues to the second ranked school, third ranked school, etc., until the resources are exhausted.

State F is not as prescriptive in this area as State A. They do, however, make it a point in their comprehensive monitoring visits to assure that districts have a systematic process for relating school

level allocations to resource needs. This was a major state emphasis, for example, in reshaping the F-1 program, described in Chapter 4. The state will accept either educational or economic deprivation criteria as determinants of school allocation levels.

In the other six states, state concern with this issue is minimal or nonexistent. Even in (directive/bureaucratic) State C, the concern that school level resource allocations be somehow reconciled with extent of need is not an area of state emphasis.

2) Local Policy and Practice

We observed two general local allocation patterns in our district visits. In some districts, strict formulas based on an educational or economic need criterion are used to allocate resources. This was the pattern in all districts visited in States A and F. It was also the pattern in three of the four large cities studied outside these two states and in many middle-sized districts as well. Those districts that used a formula allocation system on their own did so both to simplify their program management activities and to minimize political squabbles over resources. The use of formulas based on allocation principles tends to short-circuit questions about the justification for the principles.

The second allocation pattern used can be described as "ad hoc." Districts proceeding in an ad hoc manner base school level allocations on a variety of considerations. Previous allocation levels (continuity), program priorities, space problems, and principal/central office relationships are examples of allocation criteria used either singly or in combination. In most of the districts with ad hoc allocation procedures, there was an awareness that school level resource allocations should, to some extent, reflect need. However, need was often merely one of a number of factors in determining allocation levels. The result is that in some of the schools visited in these districts, the level of resources allocated is not necessarily commensurate with need; or if it is this year, there is no guarantee that it will be next year.

3) Summary

Two major local resource allocation patterns were noted in our study. Districts in (directive/program-oriented) States A and F used strict allocation formulas, based on need, to determine school allocation levels. Many large and middle-sized districts outside these states used such formulas as well because of management and/or political concerns rather than state policy. Other districts utilized more informal procedures in allocating resources to schools. Need was usually but one of the informal allocation criteria employed in these districts. Other criteria employed included previous allocation levels, space problems, program priorities, and principal/central office relationships. As a result, school allocation levels in these districts may not accurately reflect compensatory resource needs.

C. Fiscal Concentration of Effort

Varied state interpretations reflected in local policies and practices.

States are required to insure that local Title I resources are focused on a limited enough population to insure a reasonable chance of success. States and districts have interpreted the operational implications of this requirement in different ways.

1) State Policy and Practice

Five of the eight states visited enforced minimum per pupil allocation standards to insure compliance with this requirement. These states divide the resource allocation to a district by the unduplicated program participant count indicated in the district application to determine whether standards were being met. These states also examine local program designs to see if the concentration of effort appears to be reasonable. (Bureaucratic) State C makes a special effort in this area by stipulating minimum frequency of class sessions plus maximum pupil/teacher ratios for instructional programs. Three of the four

nondirective states (States E, G and H) lacked such standards. These states, however, check indicators of instructional class size on district application forms. If pupil/teacher ratios appear too high, these states may contact the district and ask that it focus its resources on fewer students.

In the five states that had minimum dollar standards, variations in policy and attention to this requirement tended to depend largely on varying state interpretations of what constitutes meeting federal expectations. Some states considered a \$200 or \$300 per pupil allocation to be adequate. Others considered a larger figure to be more appropriate. Still others considered one-half above average state and local expenditures to be adequate.

2) Local Policy and Practice

In districts visited in two of the three states that had no clearly specified minimum per pupil allocation standards (nondirective States E and H), there was generally less money spent per pupil than in districts in other states. The tendency of most districts is to spread Title I resources to as many schools and pupils as possible. States with specific "concentration of effort" requirements were successful in curbing that tendency, while states without such requirements were less successful in doing so.

The range of average per pupil Title I expenditures varies substantially among the 32 LEAs included in this study. District H-1 targets only \$150 on each pupil, reflecting the absence of a minimum state standard here and a district policy to serve as many pupils under Title I as possible. On the other hand, Districts B-1 and D-1 spend \$1,400 and \$1,700, respectively, for some of their special high intensity programs. Most LEAs target \$200 to \$400 per pupil and limit class sizes to about 20 students per instructional session.

3) Summary

Having a specific state minimum per pupil allocation standard is important to assure that local Title I resources are not spread too thinly. Most of the states visited have such a standard. In two states that do not (both nondirective), local per pupil allocation figures were generally lower than in other states visited. Local variations in per pupil allocations were fairly large ranging from \$150 to \$1,700 per pupil. States have generally played a rather minor role in this process, merely assuring some minimum per pupil standards at the district level and at times limiting instructional class sizes.

D. Student Selection

Usually limited to educationally deprived pupils, but much variation (state and local) in serving those "most in need."

There are two major policy issues relating to student selection. The first is whether state policy and practice has helped assure that program participants are, in fact, educationally deprived. A second related concern is whether state policy and practice facilitates the selection of program participants who are "most in need" of such services. In general, states have been far more successful in addressing the former concern than the latter one.

1) State Policy and Practice

Relative uniformity of state policy in this area is restricted to that aspect of this requirement dealing with insuring that children served be educationally deprived. The other key aspect of the requirement (insuring that participating students among those educationally deprived be those "most in need") is subject to considerable policy variation at the state and local level.

All eight states require districts to indicate on their application forms how students for their Title I program will be selected. These

states make it clear to their districts that they must be able to document that students in their Title I program have a demonstrated need for compensatory services. Current state emphasis on this aspect of the regulations is best explained by the statement of one state's Title I Director to the effect that the single greatest cause of HEW audit "exceptions" has been ineligible students participating in Title I programs.

States that have been least rigorous in dealing with the educational deprivation aspect of this requirement have been those whose own goals or means for the Title I program have differed somewhat from federal objectives. State B (a directive state with a history of "means" compatibility problems with the federal government) had insisted on selecting participants based on economic deprivation prior to 1973 because the state compensatory education program selected students in this manner. Similarly (directive/"means" incompatible) State A's compensatory education thrust today is one of attempting to saturate compensatory education buildings with as many resources as possible. This policy has sometimes resulted in selecting Title I participants who are already performing above grade level. In (nondirective/goal incompatible State H), the state's lack of attention to on-site monitoring of district activity has resulted in the loss of force of this state's policy pronouncements. Thus, while we can say that, in general, state policies emphasize that students selected for Title I be educationally deprived, in two of the states where federal and state goals or means run into some conflict, state policy is somewhat less clear-cut.

The "most in need" principle for student selection has been one aspect of funds allocation requirements that has generally not received rigorous state attention. Some states implicitly or explicitly accept and sometimes even encourage selection of students on criteria other than "most in need." This tendency seemed particularly acute in (nondirective) States D and E. In State D, state policies and practices in evaluation (where showing student standardized test score gains of

one month for each month in a Title I program is a high priority), have combined with nonrigorous dissemination and enforcement of the "most in need" principle to produce a situation where the state message seems to be that among those behind grade level, those students with the most potential for success should be selected. In State E, the state has been quite explicit in stating that "unteachable" students may be excluded from Title I consideration.* Like State D, State E has also stressed to districts the importance of showing impressive pupil test score gains.

It should be emphasized here that despite these states' lack of attention to the "most in need" principle, neither state viewed their policies as subverting the intent of Title I, since those served by Title I programs were among the educationally disadvantaged. These states were convinced that Title I resources can best serve federal goals if they are not "wasted" on students who have little chance of catching up with their peers.

Even among the states that clearly understood and agreed with the federal requirement to serve those "most in need", there was frequent difficulty in implementing this requirement. This is because this aspect of the student selection requirement is perhaps the most difficult one of all the regulatory areas in which to ascertain where local behavior is, in fact, compliant since extensive school level monitoring is necessary to uncover problems. For example, this is probably the weakest area of compliance oversight in (directive/bureaucratic) State C, a state which prides itself on the strength of its compliance monitoring activities. Thus, for both reasons of problematic policy and administration, we found the "most in need" requirement to be one in which state oversight was generally weak.

* All the states allow the exclusion from Title I programs of students in special education programs. States D and E, however, allow the exclusion from Title I of lowest achieving students who are above the cut-off level for special education programs.

2) Local Policy and Practice

As could be expected, given state policies, we found rather consistent local attention to making sure that program participants were educationally deprived, but much local variation in administering the "most in need" principle. Major local variations noted in selecting educationally deprived pupils were largely a function of differing state definitions of educational deprivation.

Most districts defined an educationally deprived pupil as one who was performing below grade level. Districts in (directive/programmatic) State F, however, largely restricted participation to students scoring below the 30th percentile, because the state strongly encouraged such a policy. (Directive/program oriented) State A policy defines "most in need" as students in the first (bottom) and second quartiles and requires that schools give these students priority. In addition, State A policy recommends that students remain in Title I programs for three years. Thus, a school may serve the first and second quartile students plus some third quartile students who are selected by teachers to continue in the Title I program for an additional year or two. The problem in State A, therefore, is not one of not serving those students most in need within each school, but rather a problem in selection of schools for participation and the way resources are allocated to schools. The result is a situation whereby students in the first and second quartiles in some eligible but nonparticipating schools do not receive services, while students performing above grade level in participating schools do.

With respect to implementation of the "most in need" principle, practices in the LEAs are directly related to their state's policy and level of commitment to this principle.

We observed the following four approaches to student selection in the 32 LEAs:

- Districts which have a policy directing that student selection be based on "most in need," and they implement that policy through administrative procedures that promote compliance.
- Districts which have a policy directing that student selection be based on "most in need" but do not actively enforce their policy at the school level.
- Districts which have a definitive policy on student selection, but this policy is not altogether consistent with the "most in need" principle.
- Districts which have no real policy or administrative procedures for student selection other than that students selected are documented as being educationally deprived.

These four approaches are discussed separately below.

Approach No. 1: Policy and Practice Promote "Most in Need" Principle

While many of the large and middle-sized LEAs produce computer listings of pupil test score results by school, those with the most sophisticated technological procedures are located in (directive/program-oriented) States A and F. These two states take an active interest in promoting student selection in accordance with the "most in need" principle. The largest LEAs in each of these states, for example, rank order eligible pupils from "most" to "least" in need according to both reading and math achievement scores. In addition, District F-1 has specific procedures for selecting pupils whose names do not appear on the school printouts; attention is given to implementation of district policy in school monitoring visits; and school level Title I staff must indicate exactly which compensatory education services each pupil receives. This information is then fed back into the computer program for monitoring and evaluation purposes. The heavy compliance thrust in (directive/bureaucratic) State C has resulted in some attention to the selection of students based on need, primarily because state policy results in almost exclusive selection of students who are more than one year below grade level. This policy (selection based solely on need) is followed most judiciously in this state's largest district.

Approach No. 2: "Most in Need" Policy Without Active Enforcement

This approach to student selection was probably the most common in the 32 districts. Districts with this approach were neither confused by the "most in need" requirement nor philosophically opposed to it. However, they did not thoroughly monitor school-level compliance, because their states had never emphasized this aspect of the regulations. School staff had usually been informed of the "most in need" requirement, and some districts had specified procedures for its implementation. However, contingencies at the building level frequently resulted in selection procedures that were inconsistent with the understanding of district practice held by central district administrators. On balance, students with the most severe needs probably are served more often than not, but without systematic monitoring it is not a certainty. However, in the three small LEAs in (directive/bureaucratic) State C, where state policy focuses generally on regulatory compliance issues and state visits to schools are quite common, attention to the "most in need" concept was more apparent at the school level than in districts in several other states--this despite the fact that State C does not actively monitor this aspect of the requirement.

Approach No. 3: LEA Policy Inconsistent With "Most in Need" Principle

Districts taking this approach usually disagree with the philosophical position underpinning the "most in need" principle. Taking their cues from explicit or implicit state policies, these districts seem to believe that a broad range of student selection policies will satisfy the federal requirement and not result in penalties. The most prevalent variation in the policies of these districts could be characterized as "most in need, except"; that is, "most in need except if over two years behind"; "most in need except if considered unteachable", or "most in need except if below a particular IQ score." What is perceived at the local level in (nondirective) State D as a state emphasis on impressive student test score gains, coupled with loose state monitoring of student selection procedures, has resulted in districts overtly

"loading Title I programs for success." Similarly, in (nondirective) State E, the philosophy of state Title I staff that the program should concentrate on those educationally deprived students with the most potential for success has resulted in policies in each LEA with a similar emphasis.

Approach No. 4: No Administrative Policy on "Most in Need"

Districts taking this approach were aware that federal regulations mandate selection of pupils based on need for remediation. However, they were often confused about the actual intent of that regulation, since this was not carefully explained in state or federal documents or technical assistance workshops, nor was it monitored by the state. These districts, therefore, tended to ignore this aspect of the regulations, assuming that their responsibilities for administering the student selection requirement were met once they had instituted procedures to assure that all students participating are below grade level and have, therefore, a compensatory need. In fact, the documentation of student need is considered by many districts to be the essence of the "needs assessment" requirement.

3) The Nature of School Level Student Selection Procedures

Regardless of the district approach, in most schools student selection procedures tended to be informal, more unsystematic than not, and highly idiosyncratic in accordance with prevalent values and needs in a particular school. For example, in some schools teachers were afraid of negative evaluation results and tended to select students with high potential for success. In some other schools, pleasing administrators and fellow teachers by accepting students who were "discipline problems" might be a priority. One could also find instances where procedures for selecting students for Title I math differed markedly from those used in the same school to select students for Title I reading.

However, the extent to which schools emphasize some selection factors at the expense of others varies significantly and systematically between school districts and states. In other words, while district or state philosophies, policies and procedures seemed not to impinge significantly on the processes for student selection in the schools (they were informal, more unsystematic than not, etc.), they did lead to certain differences in emphasis. This was most evident in districts which took approach number three--a definitive policy not altogether consistent with federal requirements. School staff in such districts tended to be more overt in selecting high potential over low potential students, and this criteria would often take precedence over other contending selection criteria in the school.

4) Summary

Local student selection policies and procedures are fairly uniform in minimizing participation of students whose performance is above grade level. The states have generally played a major and positive role in this area. Beyond that, however, district policies and practices tend to vary significantly, with state policy or lack of policy being a major influence upon the extent to which student selection procedures deal with the issue of "most in need." While nearly all districts visited contained schools in which factors other than "most in need" were included in student selection, the extent to which these other factors dominated the selection process varied across states. The variance ranged from districts in (directive/programmatic) States A and F where other factors were not allowed to prevail; to districts in (directive/bureaucratic) State C, where other factors had relatively little influence; to districts in the other states where other factors tended to strongly influence student selection procedures.

E. Supplanting/General Aid

General state success in insuring that obvious abuses are avoided; less success in the more subtle and complex aspects of the requirements.

As with the student selection area, state impact has been more impressive in insuring local compliance with the requirement's basic features than with its more subtle and complex nuances.

1) State Policy and Practice

Most of the eight states have devoted a good deal of their regulatory efforts toward assuring that Title I resources aid discrete target populations and are distinct from local district programs. This policy is reflected in the clear encouragement or requirement of a basic skills instructional program focus and low Title I pupil/teacher ratios in all of the states. Student selection requirements and program description requirements on the LEA application forms have aided states in administering basic policy in this area.

It is in the more complex and difficult to administer aspects of these requirements where state policy has not been as aggressive. This difficulty centers around the difficult to investigate question of where the district's basic programs end and where Title I services begin, and the basic accompanying management problem of assuring that schools comply with district policy in the supplanting/general aid area. Given these endemic problems, the need for thorough state on-site monitoring is particularly important to adequately address them. Though some difficulties in obtaining strict and total compliance with these requirements appeared to exist in all eight states, they seemed especially critical in states that minimized the scope and extent of their monitoring role.

States A and B are two states that have historically paid much less attention to the basic questions of supplanting and general aid than the other states in our study. In States A and B, there have been some fundamental disagreements with the federal government over means to achieving Title I goals. Both states believe that the federal prohibitions against supplanting and general aid are too rigid and not wholly relevant to the needs of educationally disadvantaged populations. Their policies of basically ignoring this compliance question when it was felt that their program was benefitting educationally deprived children reflects that disagreement.

State B has, however, changed its policies in this area substantially (as they have in other areas), since the occurrence in 1975 of a large scale staff turnover. Their new policies and practices are much more responsive to specific federal compliance concerns in this area. And State A, after many years of resistance, has significantly revised its school level application form to help insure that Title I dollars supplement the district-funded program of Title I students. Given the complex nature of this state's entire approach to Title I, many problems of policy implementation still remain relative to these federal prohibitions. However, the clear existence in this state of current policies that seem basically consistent with federal regulatory intent, plus evidence of first steps by the state to operationalize this policy in its new application forms, indicates that the federal government has begun to make significant impact on State A's acknowledgement of federal prohibitions against supplanting and general aid.

2) Local Policy and Practice

Local policies and procedures relating to supplanting and general aid were among the least uniform across the districts studied. Once again, local difficulties appear to be a function of confusion, indifference or antipathy toward some of the more complex Title I regulatory requirements in these areas.

Before beginning our discussion of local administrative problems in this area, it should be emphasized that as far as districts in the eight states are concerned, most Title I funds are clearly used to implement instructional programs. The days when these funds were used primarily for such things as swimming pools, band, and football uniforms appear to be over. More stable funding and carry-over provisions were perhaps the most important factors in bringing about this change (i.e., districts are no longer afraid to contract for instructional services nor do they feel that all unexpended funds are lost). In addition, all of the states visited have instituted procedures designed to insure some accountability in this area.

Problems in the area of supplanting/general aid were twofold: (1) Title I services were provided to non-Title I as well as to Title I students; and (2) Title I services were being provided in areas in which district resources should have been used. The first feature is more apparent in districts which do not use the "pull-out" model for their Title I programs. In each of the districts visited in State A, for example, it was readily admitted at the school level that Title I resources were being used to serve entire classes when an "in-class" approach was used. In districts with "pull-out" programs, the compliance questions in this area tend to be more subtle. They focus on the use of support services, equipment, and Title I teachers during their non-instructional time for general, non-Title I purposes. Here interpretations of compliant activity appear to vary markedly and are very much related to state policy. For example, districts in (nondirective) State D are aware that the state allows Title I equipment to be used by non-Title I students as long as no Title I student is deprived of the use of such equipment. They also know that the state allows Title I teachers to perform school-wide duties if these duties are required of all school personnel. Districts in (directive/bureaucratic) State C, on the other hand, are fully aware that the state has a strict prohibition regarding the above practices, and that it rigorously enforces these restrictions and others in this area during monitoring visits.

The issue of whether Title I is providing a service that should be provided with state and local resources is probably the most complex of supplanting/general aid issues. In Districts D-1, H-1, and B-1 and all the districts visited in State A, what exactly constitutes the supplementary aspects of the program became a highly relevant question. In H-1, B-1, D-2 and D-1 (all districts in nondirective states), the state has allowed the districts to pursue policies in these "gray" compliance areas without state interference; while in the case of (directive/means incompatible) State A, it is state policy itself which appears to be problematical.

3) Summary

The state can and has made a great deal of difference in terms of district policies on these more complex issues. All districts in (directive/bureaucratic) State C, for example, devoted a great deal of attention to maintaining strict, unquestionable compliance in these areas. In most other states, attention to these complex and subtle compliance concerns at the district level tended to be considerably looser than in State C. Sometimes this is a result of explicit state policy (such as with nondirective State D's policies mentioned above). In other cases, lukewarm local concern appears to reflect lukewarm state concern and/or sporadic and fragmented state monitoring activity. Local policies in (directive/goal incompatible) State A reflect that state's philosophy focused on improving its primary grade programs. In many of the districts visited in this state, it was often difficult to determine: (a) who the Title I students were, and (b) whether the Title I students were obtaining supplemental services above and beyond what non-Title I students were receiving. There are indications that State A, with federal impetus, has recently begun efforts to more comprehensively address supplanting/ general aid questions.

F. Comparability

An accepted state and local technical exercise; some complaints about administrative burden, few doubts about the need for the requirement.

Probably no regulatory area has experienced as much improvement in state and local administration leading to compliance as has comparability. Indeed, in most places comparability is an issue that exists only between one technician in the LEA and another in the SEA who monitors the LEA technician's work.

1) State Policy and Practice

Each of the eight states have policies requiring LEAs to submit annual reports certifying comparability and requiring districts to become comparable if the report shows noncomparability. States appear to pay considerable attention to making sure that their districts certify comparability in their annual reports. The major distinguishing characteristics between the states were the extent of comparability monitoring and enforcement activity. (Nondirective/goal incompatible) State H hardly monitors comparability at all, although comparability report review procedures have improved considerably in recent years because of federal pressure and the fear of federal audit exceptions. Indeed, the fear of audit exceptions in this area, plus the straightforward nature of this regulation seem to be responsible for making comparability among the most uniformly administered of all federal requirements.

2) Local Policies and Practices

The relative uniformity of state administrative attention to comparability is reflected in fairly consistent, routinized and non-controversial local activity in this area. As a regulatory concern, school-by-school fairness seems to be virtually a non-issue in most of the LEA's required to complete a comparability report. Though most

building principals and parents interviewed for this study understood the principles behind the requirement, and many were somewhat knowledgeable about some specific components of the regulation, no one expressed any concern about whether or not their school or sub-district had been treated fairly in the allocation of state/local resources. Moreover, none of the school-level interviewees who were asked the question had ever examined their district's comparability report to determine the accuracy of the data submitted to the SEA. This apparent confidence in the good faith of the central office in the LEAs studied seems to be reinforced by the formula nature of school allocation procedures in most large school districts (as indicated earlier), and the highly technical nature of the comparability report. Substantial faith in the central office exists even in two of the very large urban districts where studies of school-by-school funding disparities in the early 1960's contributed substantially to initial inclusion and eventual clarification of the comparability requirement.

Among those central office Title I administrators who are directly involved in administration of the requirement, much support is expressed for the principle of comparability, which is seen as an important cornerstone of the entire Title I program. Though many officials complain about the heavy burden of reporting, no LEA official interviewed recommended eliminating the comparability requirement. Complaints about the burden of reporting seemed to depend on whether the required data was automated. For example, officials in a 22,000 pupil district had no complaints about the burden of administration because the district's computer system could easily produce a comparability report at virtually anytime during the school year.

3) Summary

Though a thorough examination of the comparability requirement is beyond the scope of this project, it was clear from our local visits that the principle of comparability is seen as important, and that

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administrators, teachers and parents at the building level believe that it has been applied. Relatively uniform state comparability reporting requirements mandating that noncomparable districts become comparable, together with state technical assistance activities, have all contributed to positive state impacts here.

CHAPTER 7

SPECIFIC STATE POLICIES, PRACTICES AND IMPACTS: THE PROGRAM DEVELOPMENT AREAS

In this section we examine specific implementation patterns and problems associated with the program development requirements. These are:

- Needs assessment,
- Program design,
- Evaluation, and
- Parent involvement.

As with the discussion on funds allocation areas, particular attention will be given here to SEA policies and administrative practices when those factors seem related to how LEAs have implemented Title I.

7.1 GENERAL STATE PATTERNS AND THEIR IMPACT

A. Assumptions Regarding Basic Purpose of Requirements

The four program improvement areas (needs assessment, program design, evaluation, and parent involvement) unquestionably represent the most neglected areas of state and local Title I administration. The prime assumption governing the inclusion of these requirements in the legislation appears to have been that there be a systematic local process by which Title I programs are planned, evaluated, and changed. This is not to say that the requirements are not also intended to facilitate the making of good decisions about individual pupils or, from a Congressional perspective, to identify programs that work; rather, it means that the basic purpose is to make Title I programs fit the needs of target populations.

B. Limitations of Most Current State Administrative Approaches

Five of the eight states visited (those that were not highly program oriented) used, as indicators of effective local administration in program development, the same kinds of indicators used in assessing the quality of local administration in the funds allocation areas: documentation from LEAs that minimum regulatory standards have been met. This raises a problem: whereas in the funds allocation areas such local certification of meeting minimum standards (examples: lists of eligible and ineligible schools with data, detailed criteria for student selection, etc.) effectively indicates in most cases whether appropriate attention has been paid to meeting the intent of the federal requirements, in the program development areas no such connection can safely be inferred. In short, one cannot judge the adequacy of program development processes from the perspective of meeting the minimum regulatory standards. Processes must be carefully examined to adequately judge whether federal intent is being met.

By not carefully exploring and emphasizing such issues as how parents are really contributing to a district's Title I program, how districts establish priorities for their compensatory education needs, how evaluations are being used to plan for next year's activities, etc., most of the states are implicitly communicating to their districts that they do not attach very much importance to local program improvement strategies--no matter what descriptive information may be required from LEAs. For example, states that require that LEAs report only testing data for the required SEA report to USOE imply to their LEAs that achievement test data are the only important evaluation information and are needed only for federal reporting requirements. Given such messages, in five of the eight states visited, whatever local progress has been made in program development areas tended to be a locally generated phenomena.

C. Local Institutional Barriers to Program Development

When states clearly and consistently emphasize program development, there appears to be a definitive state impact on local administrative activity. In the three states that have exerted considerable energy to assure adequate local attention to one or more of the program development areas, state expectations for performance in these areas is matched with local conviction that these are indeed important aspects of Title I administration. The communication of such expectations tends partially to offset other institutionalized forces that, unattended to, would work against meaningful program change. Among the locally constraining factors encountered were the following:

- Existing programs tend to become institutionalized. Many have been in place for several years, often with the same staff, and that staff is resistant to change. Indeed, this is the primary characteristic of Title I programs in most of the 32 districts.
- Substantial changes in programs often require changing staff. This is particularly true where paraprofessional aides are involved. Community resistance to eliminating aide positions can have more to do with program design than evidence of educational need or professional judgment.
- Tendency of professionals to operate on intuition. This tendency is reinforced by the lack of confidence and/or expertise in much of the testing and other assessment data available to teachers.
- Reductions in allocations. Reductions in available funds, or even relatively stable funding during a period of inflation, increases costs and often relegates planning to simply deciding which jobs should be eliminated. This, in turn, can result in decisions made on criteria very different from those related to the needs of pupils. This, indeed, usually represents the only external factor forcing an LEA or school to closely examine program priorities, unless the state takes an active interest in this area.

The factors cited above tend to be more pervasive influences on local district operations in the five states treating program development concerns as technical compliance questions than in the three states that have made some major efforts to address program development issues.

D. Summary of Major Findings

In examining the responses to the needs assessment, program design, program evaluation, and parental involvement requirements in the 32 LEAs, we found that no district was routinely going through a systematic process that closely matched conceptions of effective program development and improvement strategies. More detailed findings are presented in Section 7.2. A summary of those findings for the broad issue area of program development is as follows:

- "Pupil selection" tends to be viewed at the state and local level as synonymous with "needs assessment," and "achievement testing" tends to be viewed as synonymous with "evaluation." Little attention is generally given to the program planning aspects of needs assessments and evaluations.
- The needs assessment and evaluation activities that LEAs engage in are, as a rule, seen primarily as technical reports to fulfill Title I requirements, not as activities directly relating to the improvement of local services to educationally deprived children.
- As was noted in Chapter 3, of the eight states only three have stressed needs assessment and planning, and one has given special attention to evaluation. These states' expectations for performance in these areas has been coupled with the operational conviction that needs assessment and evaluation are important components of state and local activities. The LEAs in two of these three states are far more concerned with program development activities than LEAs in other states.*
- Local program development activities are viewed by five of the eight states from a compliance rather than a reform perspective. This thrust has limited these states' involvement in questions of local program design to that of strongly encouraging or requiring "pull-out" programs with basic skills, instructional emphases and low pupil/staff ratios.
- The extent and quality of district parent involvement in Title I is predominantly a locally generated phenomenon in every one of the 32 districts visited. Involvement is minimal and non-substantive in the great majority of districts visited. Major exceptions to this pattern are found in many of the large cities where local contextual factors have led to a more institutionalized, influential and complex parental role in Title I administration.

* The third directive and program-oriented state did not, until recently, approach program improvement concerns with all districts, but only with those LEA officials with whom there was frequent contact.

7.2 SPECIFIC NATURE OF STATE AND LOCAL ACTIVITY FOR EACH PROGRAM
DEVELOPMENT ISSUE AREA

A. Needs Assessment (Program Planning Component)

Viewed by most states and districts as a procedure for pupil rather than program selection.

The absence of state and local efforts to insure that a systematic process exists for deciding how to design a local Title I program was one of the major findings of this study.

1) State Policy and Practice

There were two basic types of state activity in this area. Five of the eight states visited pay relatively little attention to this requirement, concentrating almost exclusively on ascertaining whether districts had filled in the application form with the necessary information to meet minimum federal compliance concerns. Interpretations of what constitutes such minimum requirements vary somewhat among the states, with some requiring listing of specific agencies and groups that have been involved in the program planning process, and others almost exclusively focusing their program development concerns on the issue of student selection (i.e., not how the program is planned, but who was chosen for the program). In none of these states is there substantial attention paid to the process undertaken by locals in developing their programs.

The three directive/program oriented states (States A, B, and F) have clearly devoted more attention to this requirement than the other states in our study. They have frequently been concerned with the process used in district Title I program planning.

In State A, this concern is directly addressed in the application document and in the comprehensive state monitoring reviews. In States F and B (before the new regime in the latter state) this message

was relayed to districts in a more subtle manner. State F's emphasis on district level accountability for all their programs, their frequent dissemination on program development areas, and their personal communications with districts tended to reinforce the position that requirements in these areas were not just minimum federal guidelines but were areas of significant state policy concern. State B's posture was considerably less uniform and formalized than State F's and did not have the backing of a general SEA thrust. The message of their concern over the quality of local Title I activities was similar to that given in State F, but was not given with equal intensity to all districts. The new State B Title I unit is attempting to correct this deficiency by using the application document as a major technical assistance vehicle in the needs assessment area. The current application details the step-by-step planning that a district must undertake in order to comply with the needs assessment requirement.

2) Local Policy and Practice

In all but a handful of the 32 LEAs included in this study, needs assessment is limited to a set of procedures by which pupils are selected for participation in Title I programs. Over the past two or three years very few of the local districts conducted any type of systematic procedure in order to reconsider program needs and to set program priorities. Some districts conducted comprehensive needs assessments first for reporting purposes; they played no role in program design.

Several of the case studies describe school-level staff as having no understanding of the definition and purposes of needs assessments, with district-level personnel being only slightly less confused. Needs assessment is done to collect the data necessary to complete the needs assessment section of the annual application required by the state. Initial program designs or revisions in existing programs are undertaken in an informal way, generally at the discretion of school district staff. Documented need for change is not perceived as necessary

to justify program decisions either to the SEA or to the local community. One local Title I director noted that, "There is no requirement that the district document that reading remediation is a greater need among Title I schools than is math instruction, health activities, and so on."

Several reasons are cited by local officials for not conducting needs assessment activities beyond those necessary to select participating pupils. First, since the states do not require a comprehensive needs assessment, and LEAs have not been found to be noncompliant, they do only that which is specifically required. Second, in several of the states, the SEA has strongly indicated a preference for programs that focus on the basic skills (primarily reading) and on the primary grades. Thus, it is contended, the key state decision regarding Title I program focus and design represent restrictions which prohibit alternative program designs. Therefore, needs assessment is viewed as a meaningless exercise to certify state mandated programs in the basic skills areas. Third, the need for "clean," auditable programs is seen by some local officials as also restricting design options, which effectively means that programs designed to meet participant needs in other than basic skills subjects can cause trouble for a district. Finally, LEA officials offered the opinion that neither their SEAs nor the USOE have provided very much direction about the need for or the manner of conducting comprehensive needs assessments. Given the lack of positive signals from state and federal agencies, the establishment of program priorities at the state level, and the need to avoid programs that might be considered noncompliant, few LEAs do anything more than what is minimally required.

The most extensive program needs assessment activities generally occurred in districts in (directive/programmatic) States A and F. District F-4 is the only one of the 32 LEAs to assess comprehensively the needs of Title I eligible pupils in the psychomotor and "affective" domains, in the area of contributory needs (health services, etc.), as well as in the basic skills domain. Given the SEA's strong support of the needs assessment activity and the LEA's commitment to the types of concerns addressed in the needs assessment, the program proposal for the

1977-78 school year will undoubtedly have funds budgeted for "affective" education and support services, even though State F has formally established the basic skill areas in grades K-6 as the priority areas for Title I funding. Two of the other three LEAs in State F were beginning to consider undertaking comprehensive needs assessment activities. The SEA's preoccupation with needs assessment, program planning, and evaluation seems to be encouraging this development. Both districts F-1 and F-2 are giving increased attention to building the capacity for systematic planning and evaluation procedures at the school level.

State A's consolidated application and program plan requirement for each school receiving either state or federal categorical funds represents a state initiated attempt to foster comprehensive planning. Effective versus "paper implementation" of that requirement is very uneven in the schools visited in four LEAs in State A. The staff of some schools seemed to be overwhelmed with the paper work and not yet in command of the concepts they were supposed to be implementing. We were, nevertheless, quite impressed with the efforts underway in A-1, the state's largest city. The Research and Evaluation Office of A-1 had developed a "how to" approach to assisting individual schools with needs assessment and planning procedures required for the consolidated application. A set of readable documents on needs assessment procedures has been disseminated to schools, and technical assistance teams are made available to schools for help in setting priorities and preparing documentation.

3) Summary

"Needs assessment" usually means identification of pupil needs to determine participation in Title I programs in most of the LEAs included in this study. As a planning tool for setting program priorities and designing services, needs assessment is a familiar concept in no more than a handful of the 32 districts. Most of the LEAs that seem to be making a commitment to examining the relative needs of educationally

deprived children periodically and systematically are found in two of the directive/programmatic states that have most formally emphasized program development concerns. Although both State A and State F have been particularly directive about the need to focus compensatory education funds on basic skills in grades K-6, the establishment of such priorities at the state level does not seem to limit the usefulness of local comprehensive needs assessment, particularly at the individual building level. The need to focus on basic skills in K-6 is one of the common rationales for not going beyond minimal federal requirements offered by LEA officials in other states.

B. Program Design

*Positive state impacts in setting basic local program parameters;
less involvement in specific local design processes.*

If systematic needs assessment is not one of the key factors in determining local program designs, an important question becomes what factors are critical? Our basic finding is that state and federal priorities, as reflected in SEA attention to compliance, seem to be the primary determinants of basic local design features, while more specific design details are determined by unique local contextual factors.

1) State Policy and Practice

The four nondirective states (States D, E, G, and H) did not consider it their function to go beyond minimal federal expectations in terms of clearly defining acceptable and nonacceptable programs, other than requiring a basic skills emphasis. These states were not concerned with what local Title I programs looked like as long as they appeared to be meeting minimum compliance standards. They have, however, made it clear to their districts that "pull-out" programs with a lower grade instructional emphasis would have no trouble in meeting such standards. Directive States A, B, C, and F, on the other hand, had very definite ideas about what district Title I programs should look like. States C

and F both had fully prescriptive requirements in terms of basic skills thrusts and lower grade emphases. However, the rationale of the two states for this policy differed. (Directive/bureaucratic) State C saw the restriction to pull-out programs (with a few exceptions) with a reading, math, and pre-kindergarten emphasis at the elementary level and limits on non-instructional expenditures as ways to prevent supplanting and general aid. In effect, the policy here, as in the more nondirective states, was designed to minimize the potential for noncompliant behavior in these areas. (More program oriented) State F, on the other hand, for many years, has had a state policy consistent with their entire compensatory education movement that calls for focusing attention on the basic skill areas and the lower grades. Their prescriptiveness in Title I is, therefore, intended as much to facilitate pedagogical reform as to insure regulatory compliance.

(Directive) State A has detailed policy restrictions for program design in which each local Title I program must address eight separate programmatic components (four instructional and four supportive). "In-class" rather than "pull-out" programs are clearly encouraged in this state, and a school must meet lower grade compensatory needs before serving the upper grades. (Directive) State B, had not until recently restricted its programs to a basic skills emphasis. This state (prior to recent major staff turnover) would often allow or even encourage Title I programs that were substantially outside of the basic skills area if it was felt that such programs could benefit educationally deprived children. In addition, until the recent staff turnover, the state had an informal and largely unstructured program approval process in which little emphasis was placed on insuring compliance with regulatory requirements. Under the new (more federally compatible and responsive) Title I administration in this state, however, parameters for acceptable and non-acceptable program design have been laid out much more clearly by this state's Title I office.

2) Local Policy and Practice

The combination of federal and state priorities in basic skills and primary grades and increased attention at the state level to compliance have been the dominant factors influencing the design of Title I programs in many of the 32 LEAs. The most obvious aspect of local Title I programs is their emphasis on reading instruction, an emphasis either strongly encouraged or required in each of the states. This is one of the few things that all the 32 LEAs have in common. Some districts view Title I as intended exclusively for reading programs. Other districts vary in their emphasis on reading, and many include pre-school and math programs in their Title I activities. A few districts also include programs in such areas as language arts and English as a second language. Guidance, attendance, psychological, and health services are also provided, more commonly in large city districts than in middle-sized urban or small rural areas.

In most of the districts included in this study, the largest share of Title I resources is devoted to pupils between the first and fourth grades. This again is consistent with either implicit or explicit state requirements. It is at this level that most of the reading instruction occurs. Math programs frequently begin with fourth graders. In some districts Title I programs are available for students up through the eighth grade, and in a few districts specialized programs for high school students are provided.

Most Title I programs are "pull-out" in nature, though this is by no means as common as the emphasis on reading and the lower grades in the 32 LEAs. Several LEAs, including all four visited in (directive/program oriented) State A, have relatively open classrooms where Title I teachers and paraprofessional aides operate in the classroom in an approach similar to individually guided education (IGE). The preparation and background of Title I teachers varies widely from part-time paraprofessional aides to the most senior teachers in the district.

Even in states that have emphasized program development concerns, we were not aware of any substantial direct state involvement in the Title I staff selection area.

In many of the larger LEAs, decentralization into subdistricts or regions or an emphasis on school-site management produced considerable variation in program characteristics among the schools of a single district. Such intradistrict program variation among larger districts is for the most part absent from districts visited in (directive) States A and C owing to the heavily prescriptive program design requirements in these two states. In the other states visited, substantial intradistrict program variations heightened the challenge of state and local administrators to provide adequate oversight and technical assistance. Such a challenge seemed to be met quite adequately in districts in some states (such as in F-1) and not as adequately in others (such as in D-1). In both cases cited above, state attention to critical program design components (or lack of same) seemed a critical factor in determining the adequacy of the local effort.*

In general, teachers and administrators seem supportive of the state emphases described above; however, some believe more attention should be given to supportive activities that they believe contribute to learning such as guidance, attendance, and health services, and the development of more positive relationships between schools and parents. In practice, such services, along with summer school programs, have been markedly reduced in the LEAs included in this study, as much because of vulnerability to audit exceptions as the lack of direct relationship to the improvement of basic skills. In State C where there has been an intensive and almost exclusive emphasis on compliance concerns since 1972, the SEA prohibits expenditure of Title I funds for services that cannot readily be demonstrated to be compliant with the rules and

* See Chapter 3, Section 3.2 for a detailed description of the nature of state/local interactions in these two large city districts.

regulations, and such peripheral services are not provided in the four LEAs that we visited. In other states, LEAs have often responded to SEA discouragement of difficult-to-monitor services by eliminating them or making sure that they are provided in addition to basic skill oriented projects. In (basically nondirective) State E, a state with a large number of LEAs and a small SEA Title I field staff, districts have clearly accepted the dictum that "a simple program is a clean program," and have provided basically "no-frills" Title I programs. In some LEAs, with funds available from sometimes less rigid state compensatory education programs or other federal programs such as ESAA, difficult to monitor services that are highly valued by district or school officials are shifted to those funding sources.

While state policy has clearly been uniformly influential in getting districts to focus on basic skills and lower grade level instructional programs, the specific nature of a state's program design is very much a function of specific local factors in all districts visited outside directive States A and C. The size of the Title I allocation to LEAs and to schools within each district is one important local factor affecting the specific design of programs. Larger allocations to districts and schools usually reflect larger concentrations of low-income and educationally deprived children. In the case of school allocations, state and district policies on the allocation and concentration of resources also affect the funds available (see Chapter 5, Section 6.2). Higher concentrations of pupils and larger funding levels seem to result in greater diversity of Title I services and, therefore, a greater likelihood that support services will be provided.

The presence of state compensatory education funds or ESAA, Title I Migrant, bilingual or American Indian Education Act funds intended to serve essentially the same function as Title I also contribute to the diversity of the total compensatory education effort of a district or school, and those services that are supported by Title I may be

more than an arbitrary "assignment of costs" decision on the part of local officials. We found that most districts work to carefully balance Title I programs against other programs. Though local officials sometimes report competition among the various federal aid programs for the reading component, whatever coordination problems exist do not seem to be attributable to the Title I requirements. While it is difficult to specify how the different uses by LEAs of Title I resources affect program design and instructional outcomes--the attribution of effects issue--it is clear that the role and impact of Title I varies markedly between districts which use it in combination with other programs to reach the same students and districts which do not have such funds available.

Another set of factors affecting decisions about which programs are supported by Title I and how those programs are designed is the nature of programs and services provided in previous years and community preferences for particular programs (when parents are actively involved in Title I decision making). The impact of prior practices or commitments is perhaps the most pervasive of these. Without basic changes in funding that force reconsideration of Title I priorities, or in the absence of complete dissatisfaction with the contribution of a program activity, programs have a strong tendency to become institutionalized regardless of their relative effectiveness. On the one hand, institutionalization is created by the Title I teachers and aides becoming a recognized and accepted part of a school's staff. On the other hand, the curriculum strategy selected for the Title I program may represent a long-term commitment on the part of the district. For example, a small urban LEA with severe administrative problems that pervaded all district activities was caught in a time squeeze when the impounded Title I funds from FY 1974 were released and when the SEA required an application for the additional funds it would receive. The LEA turned to an outside consultant to write the proposal and develop the program design, and in the process agreed to structure the entire

program around "pull-out" reading and math labs. Given the availability of the "hardware" and the cost represented by the initial investment, the LEA feels committed to maintaining its current program. Virtually no consideration is given to alternative or supplementary instructional approaches.

Community preferences for particular types of programs or for staffing patterns that have existed in the past also can serve as a major limitation to changes in program design. Community interests, particularly in the larger urban areas, can exert strong pressure to insure, for example, that a certain number or percentage of teacher aides be hired or retained for each year's Title I program. In district D-2, the strength of such interests was a major factor in the continuation of a large scale media services program, since community aides were hired in each school to serve as Media Technicians.

The above findings reinforce the points made earlier in this chapter regarding:

- the need for a comprehensive and systematic local needs assessment process to neutralize or at least minimize the potential impact of other less justifiable program design determinants, and
- the difficulty in obtaining such a process without a major state effort in this area.

3) Summary

Over the past four to five years, Title I programs have become increasingly focused so that in 1976-77, if there is such a thing as "a typical program," it is one designed to improve reading skills in the primary grades using a "pull-out" model. State policy has generally been instrumental in getting districts to cast their programs in the above mold. The major state policy variations are in (directive) States A and C where the states are highly prescriptive in the program

design area. State A is also the only state visited that actively encourages districts to employ "in-class" rather than "pull-out" programs.

Major local program design variations are in the following areas:

- The preparation, background, and placement of Title I staff;
- The degree to which non-basic skills activities are funded;
- The degree to which school-site programmatic autonomy is allowed;
- The coordination of Title I with other local compensatory activities.

State influence on the nature of one or more of these local activities is greatest in (directive) States A, B, C, and F. In general, however, local variations in these areas are functions more of local factors than of specific state concerns. Important local factors include the size and allocation level of the local program, the presence of other categorical funds, the past history of the Title I program, and the degree of community involvement and impact on program design. "Important local factors" do not normally include the results of formal Title I needs assessments.

C. Evaluation

Primarily means "testing" to both states and local districts; rarely related locally to revisions in program design.

As with needs assessment, state and local program evaluation is viewed most frequently as a mechanical exercise unrelated to other administrative activities.

1) State Policy and Practice

The five states that were not program oriented tended to have the same evaluation policies. In these states, nearly all energy in evaluation was devoted to assuring that each district had submitted pre- and post-test data on the Title I participant population. Little if any effort was made in these states to encourage the districts to link evaluation efforts to program design or to give technical assistance to districts in this area.

(Directive/program oriented) States A, F, and B have somewhat more aggressive evaluation policies, although more attention to evaluation seems called for in each of these states. States A and F have long emphasized the importance of evaluation in overall program design. This message is conveyed in State F more as an overall area of state emphasis (a statewide accountability thrust and formal and informal communications from SEA trained staff in the evaluation area) than in any specific state policy. State B has been particularly noteworthy for its efforts at the state level in evaluating and understanding the effects of Title I. They have also frequently disseminated this information to districts in an effort to give them a tool with which to plan their future activities.

2) Local Policy and Practice

Two fundamental themes characterize evaluation procedures and activities in the LEAs included in this study. First, evaluation is typically synonymous with achievement testing--very little attention is given to process evaluation or to the systematic evaluation of "affective" program objectives. Second, evaluation is primarily done in order to fill out required reports; results rarely are used to influence program characteristics. Only about six of the 32 LEAs across six states were engaged in program evaluation activities that extended beyond standardized norm-referenced achievement testing of students or that attempted to relate results to program changes. Even in states

that have made some efforts to emphasize the usefulness of evaluations, districts generally view their states as more preoccupied with technique than with usage, and more concerned with evaluation for state-level decision making than local decision-making.

For many of the local programs, the almost exclusive focus on achievement testing (to the exclusion of process evaluation or attention to the outcomes of "affective" program components) would seem to be a predictable outcome of state and federal evaluation requirements. States play a significant role in determining which data will be collected and how. And, as indicated above, almost all data required are standardized, norm-referenced test score data. Some LEAs, however, go beyond state requirements. District A-1, for example, requires schools to report information on program characteristics, parent participation, auxiliary service components, pupil services, and attendance services. And district F-2 not only utilizes and reports to the SEA criterion-referenced test results (rather than standardized, norm-referenced tests), but also develops a comprehensive evaluation report of all compensatory education services in the LEA including the state program, ESAA, Title I Migrant, and bilingual. These exceptions aside, it is clear that state reporting requirements provide the sole rationale and design for most local evaluation efforts. Local program personnel thus regard evaluation as a necessary activity conducted for someone else's purposes.

Another general observation on local evaluation efforts is that attention to evaluation is attention to technique, not to usage. Indeed, the technological capacity of many school districts--the ability to mount a major testing program, compare pre- and post-test results, produce school summary data, produce listings of individual pupils by school to submit a Title I evaluation report to the SEA in mid-summer, and often to do some reasonably sophisticated and interesting analysis of test results--these technological capacities far exceed the capacity

and/or willingness of LEA policy-makers and managers to utilize evaluation results as a management tool. State policy is often an important factor here. States will frequently comment quite favorably about sophisticated evaluation techniques in particular districts without questioning how the evaluations are being used to help the district design future activities.

There are a few important exceptions to our general findings about local evaluation activity in the 32 LEAs. The most notable exceptions are districts A-1, F-2, and H-1. In A-1, the district's evaluation activities focus specifically on the improvement of programs in individual schools. Even after the cutbacks in the district's Research and Evaluation staff during 1976-77, 19 full-time professional positions are supported from Title I alone, a figure roughly equal to district-supported evaluation staff. One of the most important functions of the A-1 Research and Evaluation Office is the technical assistance teams which work closely with Title I field staff, area curriculum coordinators, school administrators, and individual faculty as the schools develop and implement curriculum procedures based on evaluation findings. The SEA's three major planning and evaluation procedures--the consolidated application, school level monitoring visits, and the required product evaluations--when considered together, seem to have had some effect on this district's approach to school level compensatory education evaluation.

In District H-1, central office staff claim that evaluation has been used to judge the relative effectiveness of alternative strategies for achieving district goals. Some programs have been discontinued and others considerably modified as a result of evaluation findings. These activities and the LEA's general approach to evaluation are solely the result of the values and style of the superintendent and his staff; the SEA in (nondirective/goal incompatible) State H is noteworthy for its lack of involvement in aspects of local Title I administration generally, including evaluation.

One of the most comprehensive, though still largely unproven, efforts at systematically building evaluation procedures into the on-going management process at the district and school levels is underway in District F-2. District officials are attempting to operationalize the CIPP evaluation model (context, input, process, product) in each one of the LEA's schools, with particular emphasis on those receiving Title I funds. The state seems to have played two roles in this effort. First, the SEA's emphasis on planning and evaluation is credited by local officials with setting the climate for local efforts which, in part, resulted in a significant increase in the number of professionals in the research and planning offices in the last few years. Second, because of relatively close proximity to the SEA, considerable personal contact has occurred between LEA and SEA evaluation staffs which has served both a technical assistance and a directly supportive function.

3) Summary

State policy in the evaluation area has generally been restricted to insuring that local test score data is submitted to the SEA on time each year. (Directive/programmatic) States A, B, and F make somewhat more assertive efforts in this area, but even in these states the evaluative emphasis seems to be more on technique than usage, and on state more than local utility.

With some exceptions, the general attitude in LEAs is that evaluation is essentially a necessary evil, conducted to please someone else, with little apparent relevance to local programmatic concerns. In some projects, there are active attempts to utilize evaluation data for a variety of purposes, but those attempts tend to be a function of the drive and competence of the evaluator. There is some evidence that the overall planning requirements of one state (State A) and the general emphasis on evaluation in a second state (State F) have helped to create environments in which local Title I evaluation initiatives can be legitimized. Improvements in local evaluation activity have occurred largely

in the ability of LEAs to provide their SEAs with required information, while both the interest in and the capacity of LEAs to use test score results and more comprehensive evaluative information for management and program decision purposes seem to exist in only a handful of the 32 districts included in this study.

D. Parent Involvement

Little SEA influence on local participation; involvement typically minimal low and nonsubstantive with the exception of some large cities.

State impact was, as a whole, less impressive in this area than in any others studied in our site visits. What significant local variations existed were locally generated phenomena. In most cases, lack of state commitment in this area was matched with a correspondingly low level of local concern.

1) State Policy and Practice

We noted little state effort in this area generally, even among states that have taken some fairly directive stands in the other program development areas. In no state (with the possible exception of State A) did we see a major thrust geared toward making parents an integral part of the local Title I administrative process. Rather we saw most states restricting their activities to meeting what they perceive to be minimum federal requirements.

The perception of what constituted meeting minimum federal requirements varied somewhat among the states. (Directive/bureaucratic) State C, for example, has expanded its checklist in district monitoring to include a series of detailed but superficial questions involving local parent involvement activity. Many states have considered the requirement met when they have disseminated the information regarding the necessity for district and school level Parent Advisory Councils

plus the regulations concerning parental involvement, and when the existence of PACs is confirmed through the application document and in monitoring visits.

States A, B, and H have somewhat unique policies in this area. (Nondirective/goal incompatible) State H has been particularly resistant to the parent involvement thrust of the federal government and has not cooperated to any extent with federal requirements in this area beyond disseminating the federal requirements to districts. In (directive/programmatic) State B, a strong emphasis was placed under the old program on a State Advisory Council. Parents from the district PACs were urged to participate in these council sessions. There was no concurrent thrust in the area of district and school level PACs, although school-wide councils were required in State B prior to the 1974 federal mandates.

(Directive/programmatic) State A's parent involvement policies were somewhat more prescriptive than in other states visited. State A mandates Advisory Councils for all schools with compensatory education programs. In addition, school level applications require a rather comprehensive detailing of the nature of parental involvement at the school level. This is also a specific focus of state monitoring visits. One problem with State A's approach, however, is that the multi-purpose nature of district and school level Advisory Councils sometimes dilutes the impact of specific Title I interests and concerns.

2) Local Policy and Practice

Given the general lack of major direct state involvement in this area, it should not be surprising that the quality and quantity of parent participation in decision-making about Title I programs varies more than any other area of Title I practices among the 32 LEAs and 116 schools included in this study. Parent participation seems to fall into three broad patterns at the LEA and school levels:

- Strong commitment by educators to parent involvement, often predating the federal school-level requirements, and parent councils have considerable, sometimes dominating influence.
- Administrator commitment to district-level parent council, but building-level commitment and participation varies markedly.
- Real parent participation is minimal or nonexistent because (1) relatively committed educators have been unsuccessful in getting parents involved, or (2) educators are not committed and, instead, block or frustrate parent involvement.

The three states that have most emphasized program development concerns (A, B, and F) have provided the strongest impetus and support for parent participation. The primary vehicle through which these SEAs have communicated the importance attached to parent participation is the state compensatory education program which in each case required participation at the building level (for Title I and the state program) before the federal ESEA Amendments of 1974 regarding building-level PACs. Thus, districts in these three states have a longer history of school level parent involvement in Title I and an awareness that the state has some commitment to this area. Though parent participation in the LEAs in those three states is somewhat more extensive than in the other five states, even there, SEA policy seems to be much less of an important factor than local district factors--primarily the commitment of administrators and teachers both in terms of time and willingness to share power.

In the districts included in this study, extensive parent participation seems to be associated with one or more of three conditions at the local level, in addition to the serious commitment of professional educators:

- Opportunity to exert influence over key decisions. Building-level participation seems to be greater in those LEAs where buildings are allowed considerable discretion over the content of the school compensatory education program, and district level participation greater where the PAC has a strong say in Title I policy, particularly how funds are allocated to programs and to schools. However, we were not able to determine which came first, the potential for parent power or the participation.
- History of a successful commitment to community participation. Two of the large cities included in the study were involved in federally funded community action programs that served as a training ground for citizens, and raised expectations for meaningful participation.
- Crisis event. Parent participation came into its own in one of the middle-sized LEAs when a fiscal crisis threatened dissolution of the Title I program.

The remainder of this discussion addresses the characteristics and problems of parent participation observed in the LEAs and schools included in this study. The discussion includes:

- a. Problems of educator apathy and lack of commitment,
 - b. Patterns of role and function of PACs,
 - c. Training of PAC members,
 - d. Membership problems, and
 - e. Characteristics of parent participation in the large cities.
- a. Problems of Educator Apathy and Lack of Commitment to Parent Participation

In many of the 32 LEAs, including some in each of the four states, central office administrators and building principals alike shared an attitude of coolness to the parental involvement requirement. Often building PACs were only recently created; LEAs waited until it was clear that regulations implementing the 1974 Amendments would take effect in the 1976-77 school year. Just as often, building PACs were more likely to be "paper" organizations. Frequently, parent advisory

committees were organized to fulfill the bare requirements of the Title I program and only that; and in practically all of these cases, the state agencies did nothing to change this situation.

School and district officials in these districts seem to reflect two types of negative attitudes toward this provision, namely:

- (1) educators know best how to design or conduct an educational program; and/or
- (2) parents would "take over" the operation if they got their collective foot in the door.

There were some notable exceptions to the above behavior, primarily in the large metropolitan districts where district or area level advisory councils were well-organized, active, and supported by district officials and boards of education.

b. Patterns of Role and Function of PACs

Where educators had made at least minimal commitment to parent participation in Title I, three role patterns emerged:

- (1) *PACs should support school officials and Title I program operations.*

PAC members can help other parents to understand the need for this support and, through volunteers and other means, demonstrate their backing of current and proposed efforts. Several of the reports indicated the "rubber stamp" quality that pervades parental involvement activity in these districts.

- (2) *PACs should be the vehicle for improving parents' capability as parents.*

In these settings, PACs are expected to provide parent-education activities to facilitate understanding of school and

Title I programs and the acquisition of special skills to help their children overcome learning problems.

- (3) *PACs should involve parents in Title I planning, budgetary review, needs assessment, evaluation, and monitoring activities.*

In this vein, PACs are active as major or co-equal decision-makers, as "watch dogs" for Title I programs at the school level, and in some instances, in personnel selection. Of the three general approaches observed, this kind of participation is the least likely to be found. Again, in the larger cities, there is a greater tendency to see examples of this particular model. In rare instances, PAC impact was significant enough to have potentially counterproductive impacts such as when one PAC helped insure that teacher aide positions go to PAC members or friends of members. For the great bulk of districts visited, however, the nature of PAC impact never approached the point of significant positive or negative ramifications.

c. Training of PAC Members

In the typical LEA there is an extremely low level of information communication to parents by either the LEAs or the SEAs with respect to Title I programs and potential roles of PACs. Title I regulations or other illustrative or explanatory materials are often not disseminated. And sometimes when materials are disseminated, the language is unintelligible to laypersons. School and district officials, regardless of whether they manifest positive or negative attitudes toward this requirement, are often at a loss as to how to provide effective technical assistance to improve parental involvement in Title I programs and the functioning of PACs. Rarely is training for parents provided or their attendance at state or national conferences encouraged or supported.

There are important exceptions to this typical pattern. For several years State B has made parent involvement one of the key

objectives of state administration, and both materials and training experiences have had some effect on LEA participation. Parents in several of the large cities in our study had participated in frequent training workshops with funds for those workshops included in the Title I budget, and the general knowledge of program requirements by PAC members in these cities was clearly impressive. One of the middle-sized cities had a full-time in-service training director who devoted her time almost exclusively to parents. Where successful participation occurs, however, it is clear that such training activities support rather than replace professional staff commitment.

d. Membership Problems

There is considerable variation in the composition of Parent Advisory Councils and in how membership is attained. While the 51 percent rule is widely known and referred to, there are many PACs where voting and decisions take place without regard to this requirement. School officials tend to dominate or otherwise influence the choice of members or PAC decisions. Especially at the building level, Title I parents who serve on PACs are most typically involved as a result of having been sought out, nominated and/or appointed by a principal or some other staff member. Rarely was there any evidence of a procedure whereby parents choose themselves or other parents to organize, participate in, or guide building-level PACs.

Member eligibility: In District G-1, parents who are school employees (generally school aides) are not permitted to be members of school-level or district PACs. In other LEAs, such as F-2, these parents are allowed to become members but they are not permitted to vote or to hold office. In still other districts, no distinction is made between parents who are and parents who are not employees of the school system. In districts where PAC parents may be employees, there is, of course, a concern over whether their decisions are to protect their own employment situations or to support the Title I program and, also, whether they are totally free of administrator influence. In districts

where parent-employees of the LEA cannot serve as PAC members, there has been some concern (and suggestion) that strong parent leaders have been co-opted by the district through job offers, as for example was the case in G-1.

Coordination with other parent committees: Often PACs are asked to do "double-duty," i.e., to advise on more than Title I programs. Sometimes this takes the form of PACs being appendages of on-going organizations, such as PTAs, citizen advisory councils or in the case of districts in State A, state mandated school advisory councils. In one district in State A, we observed one very effective school-level PAC. Unfortunately, the interests served by that PAC were not primarily those of the Title I eligible population.

Attendance at PAC Meetings: Desegregation has become a special problem with respect to parent participation. In Districts B-2 and F-1 (districts that implemented busing for desegregation programs during recent school years), parent participation declined, particularly in PACs with marginal participation. Established parent groups became fragmented, or the "new" Title I schools were too remote from the residences of the parents for them to attend without great inconvenience.

Continuity and Cliques: Another problem area cited for meeting parent involvement objectives is "continuity of participation." In State G's SEA survey of LEAs, this ranked as one of the most important concerns among parents and administrators queried. In at least two districts, both big cities (D-1 and H-1), there have been moves to permit parents who have made significant leadership contributions to Title I to continue in elitist-type roles at the district PAC level. In D-1, this includes retaining parents whose children are no longer participating in Title I programs. (A similar possible goal was voiced in G-1.) In D-1 and H-1, such moves have been highly criticized by the

other out-ranked, less powerful, and less vocal parent members, but thus far they have been unable to effectively counter the entrenched groups. In both cases, this situation has been allowed to develop, and in fact has been encouraged, by local administrators.

e. Parental Involvement in the Large Urban LEAs

In four of the six large, urban LEAs (A-1, D-1, F-1, and G-1) visited, parent involvement in Title I is dynamic, often highly politicized, is based upon parent participation patterns that exist outside of the Title I program area, and in the case of building-level involvement, pre-date the Title I requirement.

In each of these four cities, parent participation was well established at the district level. Participants were well informed about the Title I requirements and they energetically exercised their rights and responsibilities for program application review. In F-1 and G-1, the key decision level for parent involvement is in the decentralized subdistricts or regions; indeed, in F-1, there is no LEA-wide PAC. In both cities, representation on the subdistrict PACs results from participation at the school level. The subdistrict PACs meet at least monthly, and parents see themselves as involved in influencing important program-related decisions.

PACs at the subdistrict level in A-1 and D-1 also are active in the decision process, but in both cities the LEA-wide PAC exerts greater influence over local programming than do the subdistrict units. One of the consequences of the "filtering up" process by which a parent can move from building-level participation to membership on a subdistrict PAC to the LEA-wide council is the development of an elite group of Title I parents strongly committed to their area constituency, but not necessarily receptive to the concerns of other areas of the city. This situation has created considerable tension in D-1, where the district-wide council is dominated by experienced and politically

sophisticated blacks from the predominantly black area of the city, while a growing Hispanic and low-income white population is virtually left out of the decision process.

The SEA in nondirective State D prefers to stay out of parent controversies in its largest city, a stance that meets with the LEA's approval in this as well as in all other areas of Title I administration. But the responsiveness of LEA officials to some Black parents on the district-wide PAC is reflected in the LEA's willingness to use the SEA as a convenient recipient of the "political costs" of decisions that would be unpopular with the PAC. On one occasion, the LEA included in its annual application a program component that local officials knew was clearly noncompliant, but nevertheless wanted by parents. When the SEA indicated that the component should not be approved, LEA officials said that they were pleased with the "decision." On another occasion, the LEA went far beyond what the SEA had advised would be necessary to make a component in another program compliant, and then blamed the SEA for saying that such a step was necessary. Given this LEA's usual non-responsiveness to advice from the SEA, and the fact that LEA officials know at least as well as the SEA staff what program elements are likely to be found non-compliant by federal auditors, these two events illustrate the extent to which the LEA wants to avoid direct confrontation with the district PAC.

3) Summary

There is certainly great variation among the LEAs and schools included in this study regarding the extent of parent involvement. Measured on a district-by-district basis, effective parent involvement would seem to be the exception rather than the rule. Problems of educator apathy and lack of commitment, limited PAC role conceptions, inadequate communications and training activities, and problematic membership policies all contributed to this situation in most of the districts visited in this study. But because participation is high and substantive in some of the largest and most dynamic cities, there may be both

more extensive and more effective participation in large cities than a simple statistical comparison would suggest.

Few examples of a major positive state impact on the nature of local parental activity could be cited from our case studies. Conditions in the local setting, particularly the commitment of professional educators to sharing power with parents, seem to be the currently critical determinants of effective parent participation.

Some of the supporters of the legislation that created ESEA hoped that strong and active PACs would complement the basically top-down administrative orientation of the usual enforcement procedures. Parents would, in effect, serve as "on the spot" monitors of LEA implementation of the requirements. It is not at all clear from this study whether that hope has been realized, even in those districts and schools where participation is high and parents are influential. While greater conformity to the Title I requirements may well be associated with influential parent participation, the "threat of a locally based monitor" may not be the reason. Commitment to parent participation may be just one more example of a local intent to fully implement the program requirements. Or a commitment to fully inform parents may have the important side effect of more fully informing professional educators about the nature of the requirements--perhaps the "teachers" learn along with the "pupils." Our field teams did not come across any situations in which a local PAC had "caught" LEA officials in a violation of the requirements. On the other hand, the parochial interests of some parent groups may not always be completely consistent with the intent of the legislation. For example, many parents feel as strongly as many educators do about providing services to educationally deprived pupils who want to learn and have a high potential to learn, rather than to some of those who may technically be "most in need." Indeed, in some cases the program requirements have protected the integrity of Title I from parent groups just as they have from educators.

CHAPTER 8

FEDERAL/STATE INTERACTIONS IN TITLE I ADMINISTRATION

8.1 INTRODUCTION

If (as demonstrated in previous chapters), state role orientation is so important in understanding why and how state administrative policy and impact varies across states, it then becomes increasingly critical to understand: (a) the origins of state role orientation, (b) how it interacts with federal policy in determining the nature of state administrative activity, and (c) what the implications of these findings are for an appropriate future federal role. This section attempts to address these questions for the eight case study states. It is divided into two parts. Section 8.2 examines the general nature and impact of the federal role on state Title I administration. Section 8.3 addresses in detail the origins, impacts, and implications of the various state role orientations observed.

8.2 UNDERSTANDING THE FEDERAL ADMINISTRATIVE CONTEXT

A. General Background

There is a need to compare and contrast the impact of federal versus state specific factors on the current nature of state Title I administration if federal policymakers are to understand problems related to the federal role and discover opportunities for improving state Title I administration. This section will begin this exploration by describing the current nature and general impact of the federal role on state Title I administration.

Our general findings in this area are summarized below:

- The HEW audit process is the single most important aspect of the federal role in promoting state attention to regulatory concerns. The nature of this impact is frequently indirect and not recognized by the states themselves. It is manifested in a general concern for regulatory compliance issues that in many areas results in distinctly similar administrative activities in distinctly different states.
- The U.S. Office of Education has had a much greater impact in altering states' specific Title I administrative policies and procedures than in influencing states' basic Title I approaches. USOE has frequently had a positive impact in altering specific administrative and programmatic policies. The non-threatening nature of most federal recommendations, state fear of possible HEW audit exceptions, and general respect of states for the legitimacy of the federal role as embodied in USOE have all, in varying degrees, contributed to this impact. In two states where USOE has had a significant impact in altering basic state role orientations, the USOE role had combined with other favorable state specific factors to bring about basic changes in the states' Title I program.
- In meeting their own fairly limited objectives, the federal administrative effort over the last five years has been generally successful. Some significant problems still remain, however, relative to the current federal goal of assuring uniform regulatory compliance with minimum federal standards. They are due to coordination problems between USOE and HEW auditors, federal administrative inconsistency in interpreting regulatory requirements, and a perceived lack of authority to induce two of the eight states to implement policies and practices that would run contrary to these states' basic perceptions of their appropriate Title I roles.

B. General Federal Policy Thrusts and Their Impact

1) Two Types of Direct Federal/State Interactions

State Departments of Education are aware that they must interact with two separate groups of federal officials in running their Title I programs.

The Division of Audits in HEW conducts periodic audits of Title I in states and local school districts. Federal audits examine the administrative activity of states and districts for prior years' programs. Aside from making recommendations for administrative improvements, HEW auditors also have frequently declared audit "exceptions" on funds that they believe have been used in a manner inconsistent with federal regulations. Most "exceptions" demand fiscal recovery from school districts rather than the SEA itself.

States have the power to appeal negative audit rulings. This process often takes a number of years, but usually results in very substantial reductions in penalty amounts. We also noted cases where states were able to eliminate all fiscal liabilities from audit exceptions through the appeals process.

The USOE role has been to disseminate federal regulations and regulatory interpretations to states as well as to annually monitor the quality of on-going state administrative activity through on-site Management Team Reviews (MTRs). The on-site review teams report their findings to the SEA and detail a series of acknowledgments of accomplishments and recommendations for state and LEA administrative improvement. States are required to respond to these federal recommendations in writing, but are not generally required to rectify the administrative deficiencies raised by USOE.

TABLE 1. AREAS OF DIRECT FEDERAL IMPACT AND FEDERAL/STATE FRICTION VIS-A-VIS STATE APPROACHES TO TITLE I

STATE	OVERALL RELATIONSHIP WITH USOE	MANAGEMENT ACTIVITIES			POLICY AREAS								
		APPLICATION APPROVAL	MONITORING/ ENFORCEMENT	TECHNICAL ASSISTANCE	NA*	PD*	EV*	PI*	COMP*	SCHOOL SELECTION	STUDENT SELECTION	C OF E*	SUPPL/GEN'L AID*
A	Strained	3**	2			3			1		3		3
B	Much Improved	2	2		2			2	2		2		2
C	Cooperative and Supportive	1,2	1,2			2		2		1		2	1,2
D	Cooperative and Supportive		2	2					2				
E	Cooperative but Little Respect	2	2								2		
F	Cooperative and Supportive		2			1		2	2				
G	Cooperative and Supportive	2	1	1									1
H	Strained	1	3					3	1,2				

**Code:

*Abbreviations:

**Code:

1. Major HEW Audit Impact (Direct)
2. Major MTR and OE Impact
3. Major Area of Friction

*Abbreviations:

- NA = Needs Assessment
 PD = Program Design
 EV = Evaluation
 PI = Parental Involvement
 COMP = Comparability
 C of E = Concentration of Effort
 Suppl/Gen'l Aid = Supplanting/General Aid

2) The Impact of the HEW Audit

Table 1 details the administrative areas that have been directly affected by HEW audit findings in each of the eight states. Direct audit impacts appear most pronounced in the management areas of application approval and monitoring/enforcement and in the policy areas of comparability and supplanting/general aid. State C (directive/bureaucratic) is the state that has been most directly responsive to HEW audit thrusts in their state. This corresponds to this state's clear compliance orientation. However, in State H, a state that is nondirective and would prefer to abjure responsibility for district oversight, what compliance emphases exist (and there have been some major recent improvements particularly in the application process) have been in part a direct response to early 1970s audit exceptions in that state. States A, G, and F have changed some of their management and programmatic policies as a direct result of HEW audits in their states. These changes have been accommodated in these states without altering their basic Title I approaches. Thus, many HEW audits can have issue-specific impacts without significantly altering a state's basic role orientation.

Just as important as the specific changes in state policy and practice resulting from particular HEW audits in the eight states is the more general and subtle federal impact derived from state awareness of the audit process.

It was clear that each of our eight states would have somewhat different Title I programs were it not for their awareness of the possibility of HEW audit "exceptions." That this is so might be surprising given the fact that HEW has usually failed in its attempt to collect large sums of money from noncompliant school districts. However, all of the states seem to be, to some degree, concerned over the embarrassment of audit exceptions in their states and are also anxious to avoid the tedious and the time-consuming negotiation process that follows audit exception rulings.

Each of the states emphasizes its regulatory responsibilities to a greater extent than would be the case in the absence of the audit process. Despite the major differences in state role orientations among the eight states, behavior of the states in many of the clear-cut regulatory areas was often quite similar (as indicated in Chapters 5-7). These regulatory areas are, of course, the areas emphasized in HEW audits. Though many states (and many officers in the federal government itself) belittle the impact of the HEW audit process, many, if not most, state administrative procedures and policies are structured with that process directly or indirectly in mind. And, as we will highlight in Section 8.3, were it not for the threat of such "exceptions," basic approaches to Title I in States E, C, G, and H might well be fundamentally different from what they are. Also, awareness of potential audit impact need not come from personal experience. Another state's HEW audit exception, for example, created the atmosphere for State C's compliance thrust in the early 1970s.

It is important to note that three of the four states in which the HEW audit process has played a major role in defining state Title I activity are nondirective states. These states are responding to federal regulatory emphases (albeit in some very different ways) because they are unwilling to risk the consequences of state inaction, even though such inaction (or alternative policies) may be more consistent with the state's own basic educational or administrative philosophy. In the fourth state (State C), the indirect impact of HEW audit exceptions has played a key role in changing this state's basic role orientation over the last five years from nondirective to directive with a clear compliance emphasis. That the directive/autonomous states have generally paid less attention to the HEW role is illustrative of the fact that these states often march to a beat other than that provided by the federal drummer. Section 8.3 further elaborates on these points and focuses on the implications of these findings for the federal role.

3) The Impact of USOE

As with assessing the impact of HEW audits on state Title I administration, there are two questions that appear paramount in assessing the nature of USOE impact on state administrative policy and practice:

- *Have the U.S. Office of Education's policies and practices succeeded in altering a state's basic role orientation toward Title I administration in any of the eight states?*
- *In the absence of achieving the above, has USOE had any impact on specific state Title I policies?*

a) USOE Impact on Changing Fundamental State Approaches

It must be emphasized at the outset of this discussion that USOE did not appear actively concerned with changing a state's basic orientation toward its Title I responsibilities. Rather, USOE has accepted these role orientations as given and focused on specific state administrative policies and practices. Nevertheless, an important question is the degree to which USOE has helped to alter the way states view their basic Title I functions. In short, the question we are addressing is whether the additive impact of USOE policies and practices has been a powerful enough force to shape the basic nature of a state's Title I effort.

USOE's ability to shape the nature of a state's basic Title I effort is a function of the interplay of state specific factors with the nature of federal policies and practices. When a state's orientation has been derived chiefly from pervasive cultural characteristics of the SEA itself, then the ability of USOE to change the SEA's basic approach to Title I administration appears to have been minimal. USOE has been clearly dissatisfied with basic state approaches to Title I taken in (autonomous) States A and H. However, these approaches are so tightly bound in the ethos of general SEA administrative activity that current USOE thrusts have not succeeded in making any fundamental impact on the nature of state policy and practice. In four of the other six states,

substantive USOE recommendations and policies have been easily accommodated by states without significantly changing basic Title I approaches along either the directiveness or substantive thrust continua.

In States B and C, USOE has played a major role in altering basic aspects of state Title I role orientation. This is because, in these states, there was a good match between federal policy thrusts and the new directions desired by state officials with authority in Title I. In fact, in both these instances, state officials (in State B the Chief State School Officer, in State C the Title I Director) have utilized USOE in order to solidify their own policies in Title I as well as their own major role in Title I administration. USOE, for its part, has been more than pleased to oblige these officials, since the policy directions of the officials reinforce USOE's policy emphases. Without such USOE backing (in the form of MTR reports and policy interpretations), it is clear that basic approaches to Title I would probably be very different in these two states. Implications of this finding, especially in terms of altering state role orientations in nondirective states, are explored in Section 8.3.

Therefore, it appears that the USOE role has been critical in shaping state Title I role orientation only when state specific circumstances allow for the exploitation of that role by state officials wishing to exert authority over Title I administration. When such fortuitous circumstances do not prevail, the USOE role seems not to have been a potent enough force on its own to significantly alter the basic nature of a state's Title I role orientation.

b) USOE Impact on Changing Specific Title I Approaches

While USOE has had an appreciable impact on changing overall state approaches to Title I in only two of the states visited, USOE's ability to change issue specific state administrative policies and practices was amply demonstrated in the eight case studies. Table 1 indicates specific

areas of major USOE Management Team Review impact, HEW audit impact, and areas of continued friction between states and the federal government. The Table shows that the federal government has, indeed, made a difference in a number of key administrative areas. State improvements in their application approval process (consisting chiefly of requiring greater specificity from LEAs in the application document) and in program monitoring and comparability procedures were especially noteworthy. Regardless of basic role orientation, the eight states generally found it in their best interest to heed specific federal Management Team Review recommendations.

The reason states usually heed specific Management Team Review recommendations (albeit in their own individual ways) seems to be three-fold. First, states are often able to please USOE review teams without changing their basic approaches to Title I. This is a most important point. The nature of the USOE Management Team Review process is seen by most states as non-threatening to their basic Title I approaches. MTRs frequently focus on superficial indicators of administrative effectiveness--manpower loadings, percent of districts monitored annually, data required on the application form, etc. As indicated earlier, such "indicators" may not adequately reflect the nature and effectiveness of a state's Title I administrative effort, especially in the more complex funds allocation and program development areas. By following recommendations to "beef up monitoring" or "expand the application form" states can feel they are being responsive to federal concerns (and they are, in fact, being responsive) without appreciably changing the basic messages communicated to LEAs regarding performance expectations. And it is such expectations--those reflecting basic state role orientation--that are fundamental to understanding why some states administer Title I more effectively than others.

The second reason federal Management Team Reviews have tended to prompt some issue specific state policy changes is that states tend to view recommendations of the USOE teams as precursors of possible future audit exceptions of HEW. Thus, the USOE teams are seen as providing technical assistance to states in protecting programs from future financial sanctions. This factor is an especially important one in the clear-cut regulatory areas (school selection, comparability, supplanting, etc.) in federally responsive states, although positive impacts in some relatively autonomous states were also noted.

One other distinct but interrelated factor seems to have had some influence on state responses to Management Team Reviews. This is the general acceptance of MTRs as exercises of legitimate federal authority. It is hard to separate this factor from the two mentioned previously, since all three blend together in explaining state responses to federal MTR recommendations. However, it seemed clear that aside from wanting to avoid possible HEW audit exceptions, most of the states wish to be viewed as cooperative and supportive of USOE goals. The fact that USOE has usually shown an awareness and sensitivity to state Title I institutional constraints has helped to reinforce this attitude. Especially in the area of increasing technical assistance to local school districts, many states have responded positively to federal MTR recommendations "because it is the right thing to do." (Nondirective) States H and E deviated from this pattern for different reasons. State H is indifferent and perhaps even antagonistic to many of the basic goals of USOE; while State E, though accepting these goals, has generally not found USOE assistance to be helpful.

C. Impact of HEW/USOE Coordination Problems and Inconsistent Federal Directives on State Administration

The discussion above tends to support the appraisal that federal impact on state policy, while certainly limited, has in many areas been fairly impressive. In areas where the federal government has concentrated its effort (the funds allocation areas and minimum compliance in

program development areas) we noted some degree of positive impact in every one of our eight states. There were, however, a number of instances where state policy variations were functions of differing state interpretations of federal policy. The complexities of some of the federal regulations and the divided, dispersed, and generally uncoordinated nature of the federal administrative process have combined to produce this situation. A few examples of the problem follow.

- State C, citing the possibility of federal audit exceptions, makes it a point not to allow Title I staff to perform school-wide duties. State D, relying on the advice of the USOE regional representative, specifically allows for and encourages Title I staff to perform such duties as long as performance of such duties is district-wide policy for all teachers.
- State C's move to limit Title I programs to reading, mathematics and pre-kindergarten was applauded and encouraged by USOE representatives (regional and central). One district in State C was specifically cited, however, in an HEW audit for not considering needs in other areas when designing their program.
- Many state officials indicated that USOE personnel were reluctant to put policy interpretations in writing for fear of being contradicted by HEW audits. Even written USOE policy pronouncements are often taken by states with a grain of salt. The impact of this situation on state policies seems to cut in opposite directions. On the one hand, states will often err (especially those that are primarily "federally responsive") on the side of conservatism in interpreting USOE policy pronouncements. For example, emphasis on pull-out program designs in many states occurs not because state officials believe this design is the most educationally sound or that

other designs would necessarily be illegal, but rather because they are confident that federal auditors will certify compliance with the "pull-out" approach, while they are less sure about HEW approval of other models--this despite the fact that states are aware that USOE has specifically allowed for legal "in-class" program design models. On the other hand, these same states may at times exploit the fact that USOE policy pronouncements are frequently informal and ad hoc by searching for USOE officials who will provide policy interpretations that are consistent with state policy activity. Some state Title I Directors will make a number of phone calls to USOE officials until they receive a favorable interpretation. Other states establish on-going relationships with particular USOE officials, who are usually sympathetic to state concerns, and avoid communication with personnel who tend to be relatively indifferent to such concerns.

- As could be expected from the discussion in Chapter 6, federal requirements in the areas of supplanting/general aid and student selection appear to be by far the most misunderstood and disputed aspects of federal administrative policy. Federal officials are consistent and clear in interpreting, for states, basic aspects of these requirements, but substantially less clear in dealing with some of these requirements' more complex ramifications. The result is that SEA policies in these areas tended to sometimes vary significantly from our perception of federal regulatory intent. Problems in these areas were most acute in (autonomous/often incompatible) States A and H where USOE has had great difficulty in altering state policies and practices that are consistent with these states' basic role orientations. (Further discussion of the specific difficulties in these two states occurs in Section 8.3.)

These are but a few examples of the problems associated with lack of federal coordination and inconsistency of policy. Appendix C at the conclusion of this report outlines the most prevalent areas of state and local policy confusion for each of the issue areas.

8.3 STATE ROLE ORIENTATIONS, DERIVATIONS, POLICY RAMIFICATIONS AND IMPLICATIONS FOR THE FEDERAL ROLE

The purpose of this section is to explain why each of the eight states views its Title I role somewhat differently and to begin to assess the implications of such different role orientations in terms of the nature of current state Title I activity and an appropriate future federal role. Because we found that the degree of state directiveness and the primary source of state role orientations (federal versus state) to be especially critical distinctions among the states in terms of federal role implications, we have centered our analysis around the state directiveness and state autonomy analytic dimensions. The other two dimensions (means/ends compatibility and substantive thrust) will be systematically discussed in conjunction with these two central themes.

The ensuing discussion is organized around four research questions relevant to state role orientation. They are as follows:

- *How do each of the eight states generally view their Title I responsibilities?*
- *What are the origins of these states' role orientations and what are the operational implications of these role orientations?*
- *What are the general problems with these states' approaches?*
- *What appear to be the opportunities and potential for positive federal impact given the current situation?*

Separate analyses around these questions will be provided for states with four different primary role patterns:

Pattern 1--The Nondirective/Federally Responsive States (States D, E, and G)

Pattern 2--The Nondirective/Autonomous States (State H)

Pattern 3--The Directive/Federally Responsive States (States B and C)

Pattern 4--The Directive/Autonomous States (States A and F)

A. Nondirective States - The Need to Create More State Direction

Pattern 1 - Nondirective/Federally Responsive--States D, E, and G:

- 1) *How do these nondirective/federally responsive states generally approach their Title I responsibilities?*

The three nondirective/federally responsive states have limited perceptions of their role in Title I. All of these states seem to emphasize their bureaucratic responsibilities over program development concerns. All are generally nonprescriptive in their policies. None of them goes significantly beyond federal regulations in its administration of the Title I program. Each of these states seems to keep a relatively low state profile in executing its Title I responsibilities.

These three states all (to varying degrees) accept responsibility for assuring that programs are compliant in practice as well as on paper. They all have shown (again to varying degrees) some concern for program development issues. Unlike the aggressive effort of the more directive states, however, these states' approaches are chiefly characterized by clearing up problems in Title I that are readily discernible and in which the states may effect change without a high degree of effort or change in basic role orientation.

States D, E, and G do not seem to have major means/ends compatibility problems with the federal role. These states have found no fundamental inconsistency between maintaining their basically nondirective role orientation and adequately meeting major federal goals.

Relationships between the federal government and these states appear to have been historically rather harmonious.

2) *Why and How Have These Three States Limited Their Roles in Title I?*

A state's Title I role orientation is shaped by the interaction of state specific and federal determinants. In States E and G, a limited federal set-aside has played an important part (along with a fairly unassertive federal stance) in inducing these states to limit their role to primarily modest bureaucratic concerns. In State D, the state's historic and continued overall low profile in education has combined with the federal perspective in defining this state's limited role perception. The impacts of low administrative set-aside, state political culture, and federal non-assertiveness are highlighted separately below.

a) The Impact of Low Title I Set-Aside -- States E and G

States E and G are two states whose general approach to Title I has been affected to a large degree by a relatively small administrative set-aside. Both states are primarily rural, fairly large in geographic area, and have few Title I staff. State Title I officials claim that they would like to take a more directive role in Title I administration than they take at present, particularly in the program development areas. Each state, however, has decided to orient its Title I program chiefly around compliance concerns because this is the area of greatest federal emphasis.

State E is an average sized state with a Title I staff of four and over 400 LEAs with Title I Programs. Although the state would like to do more in program development areas, it seems to feel primarily responsible for assuring legal Title I programs. Consequently, most of its resources and policies are designed to meet this goal. Two Title I field consultants spend a good portion of their time in the field, monitoring Title I activities. The

small staff size and the large number of LEAs to monitor, however, limits the average length of monitoring visits in State E to only one day. The state has also strongly encouraged relatively simple and clear-cut program designs in an attempt to assure compliant behavior.

The Title I Director in State E has not been pleased with the state's general program direction and frequently expressed to us his displeasure with the federal government for their regulatory orientation, especially as it affected his state. Indeed, a recent move by the Title I office to stipulate that reallocated Title I funds be used for Title I planning seems to illustrate this state's interest in program development. Despite such interest, however, the Title I Director feels compelled to use his current limited staff resources almost exclusively to address regulatory concerns, since he sees as his primary responsibility the protection of the districts and the state from federal audit exceptions.

Like State E, State G also has a Title I staff of only four. This staff must cover a state considerably larger geographically than State E, although in State G there are substantially fewer programs to administer than in State E.

State G seems somewhat less concerned than State E with protecting its districts from local audit exceptions. Its efforts in regulatory Title I administration are much less formal and systematic than State E's. However, it too feels strongly that the area of greatest local need is in program development and that limited resources and federal priorities forced the state to spend most of its time and resources on dealing with regulatory concerns.

Unlike State E, State G's approach to assuring regulatory compliance was not to spend a good deal of time on formal monitor-

ing but rather to disseminate a booklet detailing federal regulatory guidelines. This dissemination emphasis is also apparent in the program development area. State G, within the past few years, published and disseminated to LEAs a detailed "How To" booklet in needs assessment. The state is currently in the process of undertaking similar efforts in the areas of parent involvement and evaluation. It has not undertaken these efforts with a clear-cut state direction in mind. Rather, its policy can best be described as one of "helping districts help themselves."

As in State E, the Title I Director in State G indicated that he would very much like to increase state impact on local activity, especially in the program development areas. He indicated that with more resources he would hire more staff and would attempt to regionalize his operation, emphasizing more frequent face-to-face state/local contact, a factor shown in Chapter 5 to be associated with state administrative effectiveness.

b) The Impact of State Political Culture--State D

State D's approach to Title I illustrates the potential impact of a state's political culture, particularly the SEA culture and orientation on Title I program policies and practices. State D is noteworthy for its lack of state leadership in education generally, and has long and consistently emphasized the values of local control and autonomy in education.

The tradition of local autonomy in State D has important implications for Title I administration. State D's specific Title I administrative policies and practices have always reflected a limited state role orientation. Monitoring, for example, has been historically spotty and uncoordinated. While as many as three statewide administrative units have had some responsibility for Title I monitoring, communication between these branches and the

Title I office itself has frequently been poor. The dispersed and uncoordinated Title I structure caused the numerous Title I staff to perceive their roles very differently. Some would emphasize regulatory aspects of the program, others would emphasize program development, while others paid little attention to either concern. The state has recently made some movements to improve the coordination of their Title I monitoring activities with respect to regulatory areas. However, the basic orientation of the department has continued to restrict state Title I involvement to assuring at best the meeting of minimum compliance standards.

c) An Unassertive Federal Role As A Reinforcement of Limited State Role Orientations

One important observation made during our state visits was that (nondirective) States D, E, and G viewed themselves as being highly responsive to federal concerns. None of the three has had major problems in responding to USOE monitors or HEW auditors. State G, for example, invited federal monitors to look at some non-traditional local program designs to make sure that they were compliant. Similarly, some of the recent Title I reorganizations in State D are viewed by the state as specific "good faith" responses to federal recommendations.

That these states are able to respond to federal concerns (to both parties' general satisfaction) while remaining basically nondirective is in part due to a federal role that is itself fairly limited. Each of these three states has learned what sort of activity on their part meets federal compliance concerns. Their perceptions in this area tend to match federal expectations. They are all aware, for example, that they must make some effort to assure that students selected for Title I are below grade level in achievement, that such students can be readily identified, that local programs will focus on basic skills areas, and that local comparability reports are accurate, submitted on time, and well

documented. Failure to do anything in these related areas would result in a substantial risk of HEW audit "exceptions" and poor relations with USOE officials--neither of which is in the best interests of these state education agencies. Thus, each of these states makes efforts to assure that federal expectations are fulfilled by disseminating relevant information to districts, encouraging or recommending particular types of behavior, and even, when necessary, requiring particular types of district activity. However, States D, E, and G are careful to require no more of districts than seems absolutely necessary to maintain acceptable relations with the federal government. They, therefore, limit the bulk of their administrative activity to directly meeting (limited) federal concerns.

3) *What are the major difficulties with Title I approaches in these three states?*

Since States D, E, and G are all, to varying degrees, federally responsive, problems with Title I approaches in these states are pretty much reflections of the weaknesses of the current federal role. Title I is not a simple program to administer well. In the funds allocation areas, the complexity of some of the administrative issues often requires ongoing state direction. Our experience in these three nondirective/federally responsive states indicates that the dissemination of federal regulations to districts, the holding of occasional technical assistance workshops, and superficial monitoring, while certainly helpful and usually adequate in dealing with the most basic and clear-cut funds allocation questions, have often been inadequate to meet more subtle district compliance problems. Aspects of the prohibitions against supplanting and general aid and student selection requirements appear to be the funds allocation areas especially affected by limited state direction, because these were the most difficult areas to understand in terms of federal intent and to monitor effectively.

Either by choice or necessity, the three states visited tended to view program development as an afterthought. As a result, districts in these states usually devote little systematic attention to questions of local program design, needs assessment, evaluation, and parental involvement. Title I programs thus tended to become routinized and institutionalized within the ordinary district environment, with little or no program accountability to parents or to state officials.

4) *What appear to be the opportunities and potentials for positive federal impact given the current situation?*

There seem to be three major needs that must be satisfied if these three nondirective states are to play a more meaningful role in improving the quality of local administrative activity. The first need is simply more administrative resources in States E and G. These states' current modest level of Title I funding (given their number of LEAs), and stated willingness to expand their Title I role both lead to this assessment. It is simply too monumental a task to expect these states to undertake significantly more directive ventures with their current resource levels. Thus, in the cases of States E and G, more administrative resources are a prerequisite for an expanded state role. However, more resources may not constitute by themselves a sufficient condition for anything more than a marginal expansion of these states' roles in Title I.

The second activity needed to induce a significantly higher degree of directiveness in these three states is simply for the federal government to expect more from these states than it currently does. Specifically, the federal government must ask that states undertake efforts designed to improve the processes of Title I administration in local districts. By "processes," we are referring to those administrative activities whose adequacy can only be assessed qualitatively through familiar, ongoing state oversight. The adequacy of much local activity in the program development area, as well as local management activities (monitoring, technical assistance, and enforcement), can only be assessed in such a manner. It is not enough, for example, to know that a Title I

needs assessment was conducted in a district. A state needs also to investigate fully the needs assessment procedures and how the findings influenced Title I program design. While we do not advocate that states prescribe specific needs assessment processes (as long as minimum standards are met), the state does have a responsibility to insure that such systematic local administrative processes actually exist, that they are utilized in the conducting of needs assessments, and that results, in turn, are used to guide local program design.

There is good reason to believe that an expanded and more clear-cut federal role could have a positive impact on state administrative behavior in these nondirective, federally responsive states. As mentioned above, each of these states has been fairly responsive in areas in which the federal government has stated clearly: (a) federal policy, (b) minimum compliance expectations, and (c) the consequences of noncompliance. In fact, the existence of the first two factors alone in these states has often been sufficient impetus to improve state programs.

Federal impact in these three states has proven most effective, thus far, in the funds allocation areas. Weaknesses that still remain with respect to funds allocation issues in these states appear to be largely a function of ambiguous federal messages regarding minimum expectations and consequences for state inaction. The important point to note, however, is that current weaknesses in this area reflect failures in the substance of federal policies rather than in the administrative system designed to implement them. None of these three states, for example, has devoted much attention to the question of student selection based on "most in need" because (we contend) the federal government has not emphasized compliant administration in this rather confused and hard-to-administer area. Weak state administration in the Supplanting/General Aid areas seems to be due to the same factors. In short, given an area of weak federal emphasis and limited state administrative resources, there is frequently insufficient independent incentive for states to play a more directive role in administering the more complex

aspects of some of the funds allocation requirements. Thus, a more assertive federal role, emphasizing the three factors cited above, appears needed to create such new incentives in these three states. Some specific recommendations in this regard are presented in Chapter 9.

In the program development areas, weaknesses in the federal role involve more than a need to clarify and enforce a set of minimum federal standards. Minimum federal expectations have in most cases been rather clear in these program development areas. We observed, however, in Chapters 5 and 7 that the meeting of these expectations is often gauged by irrelevant indicators. While checking to see that local school eligibility calculations are filled in correctly on the application form is usually a reliable indicator of attention to this requirement (indicating the types of tests used, surveys taken, people interviewed, etc.), it is usually a useless indicator of whether or not districts are actually engaged in the comprehensive program planning mandated in the needs assessment requirement. Only by more thoroughly exploring the nature of local administrative processes in addressing these program development concerns can a state help insure that adequate local attention is being paid to actually meeting the intent of these requirements. Currently, however, the federal government has not provided these states with any incentive to look more closely at these local processes.

Assuming that federal policies are successful in giving states an incentive to be more directive in a number of areas and the resources with which to accomplish these ends, nondirective states might very well still be deficient in the knowledge of how to go about improving the quality of local administrative activities. The federal government must, therefore, also be prepared to emphasize its role as a builder of state administrative capacity in many nondirective states through increased technical assistance activities.

In conclusion, then, we view the challenge to the federal government in improving state Title I administration in these three nondirec-

tive and federally responsive states as consisting of: (a) convincing these states that it is in their interest to take on added responsibilities in insuring quality and compliant local administrative behavior, and (b) giving these states enough resources and expertise to fulfill these new responsibilities. Particular policy recommendations that relate directly to these concerns are forthcoming in Chapter 9.

Pattern 2 - Nondirective/Autonomous States--State H:

1) How does this nondirective/autonomous state approach its Title I responsibilities?

Although State H is a nondirective state, it approaches its Title I responsibilities in a fundamentally different manner than the three other nondirective states. The major concern of State H is the assurance that its districts have "complied on paper" with federal regulatory requirements. This is because the state sees its role solely in terms of protecting the interests of districts in continuing to secure federal resources. Since lack of documented evidence poses by far the greatest potential danger to the maintenance of such resources (through HEW audit exceptions), the rationale for assuring "paper compliance" is apparent.

State H sees no major role for itself beyond assuring "paper compliance" because powerful state officials do not believe that either the state or federal government should tell districts how to administer their own resources.^{*} This belief, of course, frequently corresponds with some major substantive goal compatibility problems with the federal government. It should be pointed out, however, that State H has responded to federal concerns when it perceives the price of autonomy as being too great. It has thus been particularly oriented to avoiding HEW audit exceptions, as indicated above.

^{*}As with other descriptions of state role orientation, it should be emphasized that these descriptions are necessarily simplistic generalizations of overall administrative philosophies observed at the SEA.

- 2) *Why does this nondirective/autonomous state view its role in this manner? What are the major ramifications of this state role orientation?*

As in State D, state political culture plays a major part in understanding the State H approach to Title I. This state has a history of minimal substantive involvement in education and other social service areas and an extremely strong tradition of local autonomy. There is also a long-standing tradition of state autonomy and resistance to "federal pressures." The orientation of both the state education agency and the state Title I office generally reflects and reinforces this dominant state context.

State H's policies in Title I are products of the twin goals of wanting to remain respectful of local autonomy while also jealously guarding the preserve of local resources. Hence, the state Title I office devotes nearly all of its attention to assuring that districts certify, on their application form, that they are running a clearly compliant program. In this manner it is hoped that the state will avoid any audit exceptions from HEW. Any state activity beyond this rigorous application review procedure in State H is decidedly minimal. Practically no attention is paid by the state to local Title I administrative processes or program development activities. Even formal monitoring for compliance is a relatively rare occurrence in State H. To the extent that it is done at all, it seems to be clearly a function of sustained federal prodding.

It is most important to note here that we did encounter individual state officials in State H who expressed the willingness to make major contributions toward improving the quality of local Title I efforts and going beyond a minimum-standards orientation. These individuals, or sometimes groups of individuals (factions), were able only to have isolated and limited impact on state policy, however, because of the state's Title I structure and the pervasive influence of overall state educational policy. The dispersed Title I structures further inhibited the potential impact of such individuals because of their inability to

join together and form a cohesive "client-oriented bureaucracy" that could effectively challenge State H's extremely nondirective stances.

As with the other three nondirective states, State H does concern itself with maintaining an acceptable relationship with the federal government. The distinction to be made between State H and the other three states in this regard, however, is that because of State H's unique role orientation, an "acceptable relationship" with the federal government means to them an almost exclusive concern for assuring that districts continue to receive regularly Title I monies from Washington without complications. Thus, any federal efforts not seen as directly related to that concern are likely to be treated gratuitously. For instance, State H usually pays little, if any, attention to federal MTR recommendations because it feels that HEW auditors will not follow through on many of the USOE findings to the extent that sanctions will be imposed for noncompliance. Because of basic means/ends compatibility with the federal role in the other three nondirective states, there is more willingness in these states to be responsive to federal concerns, whatever their source. Such concerns are considered to be reflections of legitimate federal authority and, as such, deserving of at least an attempt at response. An attitude such as the above cannot be attributed to State H.

3) *What are the general problems with this state's approach to Title I?*

The problems with the administrative approach of State H are similar in type, but much greater in magnitude than in the other three nondirective states. The extreme paucity of state/local contacts and general state administrative oversight makes local compliance with even the simpler funds allocation questions often problematic. In the more complex funds allocation areas and in program development the potential for problems multiplies because: (a) application document entries cannot serve as adequate compliance indicators for either the districts or the state, and (b) the maintenance of compliance in these areas requires major local efforts for which no outside incentive is provided.

In addition, state technical assistance efforts in the program development areas are almost non-existent, often leaving districts that may want to improve their administrative efforts without the knowledge and capacity to do so.

4) What appear to be the opportunities and potential for positive federal impact given the current situation?

There seems to be no doubt that State H's administrative policies and practices could be considerably improved if the federal government were to take a harder line on the consequences of enduring noncompliance. For all of the compliance problems and laxity in administrative oversight observed in our visit, we were impressed with the fact that State H has always attempted to play by the "rules" of the federal game. This is evidenced by state efforts to assure that their districts have documented compliance "on paper," since documentation is at the heart of the HEW audit thrust. They have also tended to respond positively to USOE initiatives in the area of comparability, because they did not wish to have their districts subject to future audit exceptions in that area. Conversely, their lack of movement in the area of parent involvement, despite USOE protestations, is due primarily to a belief that the federal government cannot collect "damages" for noncompliant behavior in this area. Likewise, they have refused to substantially increase on-site monitoring.

Thus, as a first step a tougher, more enforcement-oriented federal role is necessary if state Title I administration in State H is to be changed for the better. While the effectiveness of such federal enforcement is decidedly limited in program development areas ("you can't do brain surgery with a pick axe"), only such a role, we contend, would at this time effectively combat the pervasive state specific factors that have thus far shaped this SEA's extreme nondirectiveness. Perhaps in the process, such a "get tough" policy will bring to the forefront and into positions of authority those SEA factions that believe in a more directive, federally responsive, and program development oriented state

role. If this in fact were to occur, the federal government could and should begin to work with the state to improve its capacity in the more program centered administrative areas. Some specific recommendations along the lines presented above are given in Chapter 9.

B. Directive States - The Need to Reshape the Quality of State Direction

Pattern 3 - Directive/Federally Responsive States--State B and C:

- 1) *How do these two directive/federally responsive states generally approach their Title I responsibilities?*

Each of these two directive/federally responsive states wishes to play a major role in influencing the nature of local administrative behavior, although the substantive thrusts of each state's directiveness are somewhat different.

State C focuses the great bulk of its administrative attention on regulatory compliance issues. The state is extremely prescriptive in its approach to assuring compliance and has tended to see its role as primarily a management responsibility. State C has been particularly responsive to federal compliance concerns over the last five years, to the point where many of its policies are more restrictive than necessary to fulfill federal requirements. State B, on the other hand, has historically emphasized program development concerns while largely ignoring regulatory ones. Recently, however, State B has become much more responsive to federal thrusts and is considerably more prescriptive and systematic in its administration of regulatory issues. Unlike State C, however, State B sees activity in the program development area as comprising an important part of its role. It is thus attempting to emphasize its new regulatory function while not sacrificing its previous directive thrusts in the program development area.

- 2) *Why and how have these two directive/federally responsive states taken major responsibilities in defining the nature of local Title I administrative activities?*

There are two major points to make in response to this question before discussing the impact of any specific factors on particular directive state postures. The first is that directive states in general, and States B and C in particular, have enacted their Title I policies as a way to fill "voids" in federal policy. As detailed earlier in this chapter, the federal role in Title I is a limited one in many areas. After broad federal policies are conveyed, the federal government allows states and districts to fill in the details. One fundamental distinction between directive and nondirective states is that the former voluntarily fill in such details while the latter rely almost exclusively on school districts to do so. States in the former category are that way for a number of complex and interrelated reasons. Our focus below on a few specific factors or determinants is not meant to deny the existence or importance of others, but merely to state that these three factors appear to be important and readily discernible.

The second point to be made is that despite the fact that the federal role has not been geared directly toward making states directive or even in maintaining such directiveness, ramifications of even a limited federal involvement have had that effect in both States B and C. In these states, the federal emphasis on regulatory compliance issues was exploited by the Chief State School Officer in State B and the Title I Director in State C in order to get their states to play particular types of directive Title I roles. In these two cases, federal oversight (combined with other state specific factors) helped to create and maintain directive state postures through indirect support of particular SEA factions. The above finding is especially noteworthy because States B and C are two states one might expect to be much less directive, given general nondirective state approaches to educational administration. The positive impact of the federal government in these states thus lends further support to the thesis that a potential exists for the federal government to induce a relatively high degree of state directiveness in states that would be basically nondirective without such inducements. Particular federal policies and practices have the potential of lending

institutional support and backing to the development of directive factions within state education agencies that share federal goals and concerns.

In both States B and C, particular individuals have played significant roles in leading their states to more directive and federally responsive postures. In State B, a new Chief State School Officer has worked to change the thrusts of his state's compensatory education program. Prior to his assignment, State B's thrusts for compensatory education had long emphasized program development areas with the state seeing its role solely as facilitating a local consciousness that would be sensitive to the needs of disadvantaged children. Thus, State B's own compensatory education program had few regulatory requirements, and the Title I program was set up similarly. Little attention was paid to regulatory concerns. The Title I application document was a two-page form that encouraged local innovation in their Title I compensatory programs. There was very loose monitoring in State B on regulatory issues (comparability, school selection, supplanting, etc.). In addition, for a number of years, school selection procedures in State B differed sharply from the federal Title I requirements. Specifically, children were chosen to participate in the program based on economic rather than educational needs criteria, a practice consistent with the standards set by the state's compensatory education program.

The Chief State School Officer (CSSO) in State B was not at all pleased with the lack of attention paid to management responsibilities in the old Title I program. He wished to make Title I more accountable to his office. His own management orientation also made him uneasy about consistently negative Federal Management Team Reviews in his state. To put his own stamp on this historically autonomous program, State B's CSSO restructured the Title I office in his state, bringing it more directly under his auspices. The impact of this change in State B has been major. The entire Title I unit in that state resigned in 1975 because of objections to this new state management orientation. The new Title I unit has adopted the posture desired by the CSSO and has insti-

tuted policies that are much more consistent with federal expectations. This includes more on-site monitoring, more attention to the application approval process, and more concern with regulatory compliance.

There is a conscious effort currently being made in State B to pursue these new regulatory concerns without ignoring program development aspects of local Title I efforts. A primary example of this latter thrust is that the state recently gave districts detailed step-by-step instructions on their application forms on how to conduct an adequate needs assessment. As highlighted in Chapter 7, the absence of systematic local needs assessment procedures is the rule rather than the exception for the 32 districts studied.

In State C, the Title I Director has used all the institutional resources available to him in order to create a Title I program consistent with his personal role orientation. State C's Title I Director was able to assume a leadership position in his state because the state had largely failed in previous years to assure locally compliant behavior. Specifically, the CSSO in State C was aware of the compliance difficulties that his state had historically had and the new federal thrust in taking back monies because of HEW audit "exceptions." The new Title I Director has consciously used the threat of possible HEW audit "exceptions" to pursue more directive state activity in many regulatory areas that would otherwise have been antithetical to state behavior. Thus, without federal backup, this state's administrative path would almost assuredly be a markedly different one.

The Title I program in State C reflects, to a large extent, the management and compliance orientation of that state's Title I Director. Title I monitoring activity in this state is intensive and fairly comprehensive. In the areas of comparability, program design and supplanting/general aid, the state has expanded upon federal requirements in an effort to assure compliant behavior. Programs in State C are restricted to reading, math, and early childhood and, in all but the

most exceptional circumstances, must concentrate on lower grade levels. Maximum pupil/teacher ratios are mandated statewide as are the frequency of Title I sessions and acceptable program design models. In addition, the state requires an extra comparability report in the spring in order to assure comparability maintenance.

In comparison with this high level of concern over assuring regulatory compliance, state attention to issues of local program development is extremely minimal in State C. Virtually all aspects of state Title I activity here are viewed from a regulatory perspective. Thus, in terms of program development aspects of Title I, State C more clearly resembles orientations and policies of the four nondirective states than those in the other three directive states.

3) *What are the general problems with these Title I approaches in the two directive/federally responsive states?*

Administrative problems noted with the role orientations of these two states are not dissimilar to some of the problems encountered in the nondirective/federally responsive states in the more complex funds allocation areas and the program development areas. State C's nearly total emphasis on assuring strict local compliance raises some serious questions about the adequacy of their program development policies, but few about their approach to even some of the most complex funds allocation questions. As with the three nondirective states described earlier, there is a need for State C to more actively determine the adequacy of local attention to program development questions. This, in turn, will require an orientation that is programmatic as well as bureaucratic. Getting a state such as State C to adopt successfully a more programmatic orientation may not be an easy task. The current capacities of the personnel in State C, while ideally suited to moving districts from a generally noncompliant path to compliant activities, and maintaining compliance, may be ill-suited to developing further local capacities once these initial compliance goals are reached. Getting such personnel

to focus more on administrative and educational process questions may be a currently unattainable expectation given this staff's educational background and current role orientation. Major federal technical assistance efforts and more state administrative resources may be necessary to give this state the technical capacity and the ambition to further improve its Title I administrative efforts.

State B's role orientation and related policies are so recent that to evaluate problems with these new approaches would, at this point, be somewhat premature. In general, we were impressed with the new-found balance between bureaucratic and programmatic areas evident in this state's policy thrusts. However, we are concerned about the adequacy of state attention to the more complex and difficult to administer areas of student selection and supplanting/general aid, as well as the ability of the state to address adequately program development issues given a relatively low state administrative set-aside and lack of current federal emphasis on state program development activities.

4) *What appear to be the opportunities and potential for positive federal impact given the current situation?*

The federal government has a distinct set of advantages if it wishes to change state administrative activity in these two directive and federally responsive states (as opposed to the three nondirective and responsive states). In the three nondirective states, the major federal challenge is to create enough incentive for these states to become involved and active in crucial local administrative process questions. These two directive states have already demonstrated a willingness to become involved in local processes, at least in some administrative areas. Both states, for varying reasons and in varying manners, have already undertaken state policies designed to change local behavior patterns. The challenge to the federal government in these states is in maximizing the positive impact of such state/local interaction.

In State C, and more recently in State B, much of the rationale for state directiveness is derived from the nature of federal Title I policies. As mentioned previously, in both these states more directive Title I postures have been created and maintained with federal backup. This provides the federal government with an excellent opportunity to change state activity by expanding its own role. Given the above situation, we see federal strategies very similar to those in the three nondirective states as having a greater potential for positive impacts in these two directive states (States B and C) since these states have shown themselves to be both federally responsive in designing their program, and frequently directive in their past relations with LEAs. Again, a successful federal impact in these two states seems to depend in varying degrees on the existence of the following factors:

- Federal policy must be clear and explicit.
- Minimum compliance expectations must be clear and explicit.
- The consequences of non-compliance must be clear and explicit.
- Adequate technical assistance must be provided.
- Adequate administrative resources must be provided.

Given these states' recent history of federal responsiveness and directiveness, the importance of factors 2 and 3 above are chiefly to protect the controlling Title I factions from attack by more nondirective and/or nonresponsive SEA factions. Factors 2 and 3 should thus be kept in the background and attended to when necessary as the federal government, in its interactions with state Title I officials, emphasizes its communications and technical assistance roles. Although, on the whole, programs administered in (directive/federally responsive) States B and C had more positive impact on local behavior than in States D, E, and G, there remains a need for an added emphasis on program development (especially in State C) and improved administration of the more difficult and complex funds allocation requirements (especially in State

B). As mentioned above, the federal task in these two states should be made easier by the fact that they have already demonstrated a willingness to become highly involved in the nature of local Title I administrative activities.

In conclusion, then, we view the challenge to the federal government in improving state Title I administration in these two directive/federally responsive states as involving: (a) expecting the state to pay more attention to local administrative processes, and (b) giving these states enough resources and expertise to fulfill these new responsibilities.

Pattern 4 - Directive/Autonomous States -- States A and F:

- 1) *How do the two directive/autonomous states generally approach their Title I responsibilities?*

In many ways, States A and F approach their Title I responsibilities rather similarly. Both states are directive, both emphasize their roles in improving program development aspects of local Title I activities, both states' policies have been largely derived independently of the federal role, both states are fairly prescriptive in their approach to Title I administration, and both states have shown some concern over local administrative process questions. However, while State F perceives its own administrative procedures for meeting the needs of compensatory education students as being basically compatible with prescribed federal procedures, State A perceives the nature of its procedural approach as basically incompatible with federal administrative requirements.

- 2) *Why and how have these two directive/autonomous states taken major responsibilities in defining the nature of local Title I administrative activities?*

The Title I programs in States A and F have both largely been shaped by State Compensatory Education programs that, in some instances, precede Title I. State A's compensatory education program is nearly identical to its Title I

effort. In fact, schools in State A do not really care if they receive state or federal Title I compensatory resources since the requirements for them are identical. The only real distinction between the state compensatory education program and Title I is that school selection procedures are somewhat different. Schools are ranked on the basis of educational need for the state program as opposed to the economic deprivation criteria used in Title I. However, aside from that restriction, a restriction necessitated by clear-cut federal regulations, the Title I and state programs are administered in a virtually identical fashion at all administrative levels.

State A's entire compensatory education program (Title I plus state programs) reflects the compensatory education goals and means to achieving them of this SEA. More specifically, the program reflects the ideas of the SEA's Chief State School Officer. Upon taking office, the CSSO in State A eliminated much of the power of the old and relatively autonomous compensatory education unit. He moved to substantially restructure Title I in order to conform to a school-based planning orientation. Title I was to be largely administered by an elementary education unit, this unit being responsible for all school level concerns at the elementary grade level, including compensatory education. A greater degree of prescriptiveness and concern for school level accountability (with state-defined goals) became the concern of all categorical programs including Title I, as did the emphasis on integrating categorical efforts to improve the environment of entire schools.

The result of these efforts has been a Title I (and state compensatory program) emphasis on planning, evaluation, and monitoring of local program quality, strict school level allocation and eligibility criteria, and the policy of saturating a Title I school with a large amount of Title I resources before funding the next Title I eligible school. State A does not think of its Title I program independently of its entire compensatory education movement. Title I, the state compen-

satory education program and other state categorical and general aid programs are all part of a concerted effort to reform education in State A--thus the highly directive and independently derived Title I role orientation of this state.

In State F, a long-standing state compensatory education movement has reinforced the direction of this state's Title I administrative efforts. State F's compensatory education program heavily emphasizes local outcome accountability, basic skills, and selection of children who are most in need. Title I requirements in State F are totally compatible with these thrusts of the state education program. Title I staff emphasize program development in their contacts with local school districts and instate regulatory requirements. The SEA communicates to districts that requirements in the needs assessment and program evaluation areas are not just minimal federal compliance concerns but should be taken seriously. In addition, the state restricts program design to reading and math in the lower grades, a restriction which is consistent with its compensatory education thrust.

- 3) *What are the general problems with these Title I approaches in these two directive/autonomous states?*

The cases of States A and F highlight the potential importance of the federal and state means/ends compatibility dimension when the fundamental nature of state policy direction is derived largely independently of the federal role. Directive states by definition have a particular conception of what they wish to accomplish with their state's Title I administrative policies. Often these conceptions conform to the federal conceptions of what states should be doing as embodied in USOE regulations and administrative policies. Sometimes these federal regulations, in fact, are significant in shaping basic state role orientations, as in State C and more recently in State B. Unlike the federally responsive states (those that take most of their administrative cues from federal administrative emphases), implicit in the concepts of "autonomous" and

"directive" (as opposed to "federally responsive" and "directive") is the assumption of a series of major independent state compensatory education goals and philosophies on how best to achieve them. The possibility, therefore, exists of noncooperative responses to particular federal initiatives when these goals and operational philosophies are perceived as threatened by such initiatives.

The State A case offers the clearest illustration of this kind of problem with the situation in State F providing an ideal contrast. Problems have developed for State A's Title I program, (vis-à-vis the federal government) when some of their independent program thrusts have conflicted with federal interpretations as to what constitutes compliant state and local behavior. In many areas no conflict exists. Indeed, state initiatives in evaluation, program design, and concentration of effort appear to exceed minimum federal requirements. However, the lack of state attention to monitoring some key regulatory areas (particularly supplanting/general aid) has conflicted significantly with federal expectations. Where the federal government wishes to be able to track Title I dollars to ensure their compliant utilization, State A has been much more concerned with the question of how to use Title I in conjunction with other state compensatory monies so as to reform the environment of entire schools. Thus, State A's compensatory education thrust has, on occasion, been viewed by both SEA and federal officials as being in conflict with federal regulatory standards.

The fact that both sides in the State A dispute perceived the basic legitimacy of their activity as being at stake when attacked from the other side has caused each party to adopt strong and uncompromising stands in areas of conflict. The federal government feels that the State A challenge must be put down strongly to maintain the integrity of the Title I regulations. Conversely, State A believes just as strongly that the federal position must be resisted if the integrity of its own compensatory education thrusts is to be maintained. The important thing

to note about both sides' postures in these disputes is that: (a) they both feel they are fighting for the best interests of disadvantaged children, and (b) they both feel it is a fight they could well lose if they show any signs of weakness.

The situation in State A contrasts sharply with that in State F. Unlike State A, State F's independent interest in compensatory education is not viewed as being threatened by the nature of federal requirements. Nor does the federal government see State F as challenging its legitimate authority. Both sides recognize the legitimate and significant interests of the other. Neither side feels it has anything to prove to the other. The result is a fairly productive working relationship, despite some areas of "means" incompatibility that may, in reality, be as significant as the areas of perceived means incompatibility in State A. While it would certainly be inaccurate to call the administration of Title I in State F "problem free," it would be accurate to say that this state's directiveness, its programmatic as well as bureaucratic thrusts, and its absence of major goal compatibility difficulties with the federal government make it a state that seemed further along in impacting positively on all relevant aspects of local administrative behavior than any of the other states visited.

- 4) *What appear to be the opportunities and potential for positive federal impact given the current situation?*

Federal success in directive/autonomous states depends on the federal government's ability to recognize the nature and rationale of state direction and to enact policies and practices that can accommodate the goals of such direction within the Title I regulatory framework. State A's difficulties are a function of the fact that both the SEA and the federal government have challenged the appropriateness and legitimacy of the other side's administrative activities. Feeling so challenged, each side has devoted all their efforts to insuring the survival of its own policies and practices, even in areas where mutual accommodation could probably occur.

There seem to be two needs that have to be met to improve the situation in State A and states in similar positions. First, there is the need for both the federal government and the SEA to know that USOE has the legitimate authority to interpret federal regulations and to require that State A adhere to them. Thus, as in the case of State H, where there are also major regulatory compliance problems stemming from state/federal incompatibility of means or ends, we see a tough regulatory enforcement posture as being an essential first step in improving Title I administration in State A.

Unlike State H, however, we see the distinct possibility in State A of state and federal officials working together to deal with legitimate state concerns once the legitimacy of the federal role and the integrity of federal regulations are assured. For the federal government to always confine its role in State A to that of a strict regulatory enforcement would be to deny that the state has a strong, independent contribution to make in serving the needs of disadvantaged children. The federal government would be saying in effect, "Your concerns are irrelevant to the problem at hand. All we care about is that the program is being run compliantly." While the chief concerns of some states are certainly largely irrelevant to "the problem at hand" (for example, State H not wanting to interfere at all with local autonomy), this does not appear to be the case with most of State A's concerns. State A has shown a clear commitment to meeting the special educational needs of disadvantaged children. They have also demonstrated a willingness to alter the nature of local administrative activity and an interest in questions of program development. For this state's Title I program to show greater improvement, efforts must be made to accommodate relevant state concerns while still maintaining the integrity of the Title I regulatory framework.

In conclusion, once the battle of assuring the integrity of the Title I regulations in State A is won, the federal government should

proceed in trying to "win the war." It can accomplish this by eventually relying less on overt authority relationships, and more on persuasion, negotiation, and accommodation in an effort to meet legitimate state programmatic concerns as well as federal regulatory ones. Some specific recommendations that address these points are presented in Chapter 9.

CHAPTER 9

CONCLUSIONS AND RECOMMENDATIONS FOR FUTURE FEDERAL APPROACHES TO TITLE I ADMINISTRATION

9.1 INTRODUCTION

The purpose of this study was to identify ways in which and the extent to which Congress and HEW/USOE can effect improvements in state and local Title I administrative policies and practices. We were also asked to determine where specific changes appear necessary in Title I statutes, regulations, and federal and state administrative policies and practices. In this final chapter, the broad conclusions discussed in detail in Chapters 3 through 9 are reviewed, and recommendations for future federal policies and strategies are presented.

9.2 MAJOR CONCLUSIONS

Throughout our case studies, we separated issue areas of Title I administration into two broad categories: funds allocation issues and program development issues. We did this because we perceived the nature of Title I administration as posing two distinct questions: (a) are districts providing resources in the legally prescribed manner so as to assure that these resources are used for appropriate purposes and to serve an appropriate population of students, and (b) are districts designing their Title I activities so that these Title I resources are used in an optimal manner?

Historically, federal Title I administrators have focused their attention primarily on the legality of programs. Poor federal dissemination, weak state and federal monitoring procedures and strategies, and inadequate commitment to compliance on the part of state education agency and school district personnel all contributed to major compliance problems during the first decade of the Title I program's operation.

In the early 1970s, the federal government commenced a major campaign to improve state and local performance in the funds allocation areas. It has continued this general thrust since that time, emphasizing adherence to the federal regulations, more active dissemination of regulation interpretations, and the utilization of HEW audits (and, more important, the threat of such audits) as major vehicles for attaining its objectives. As a result, considerable improvement in the administrative performance of SEAs and LEAs has occurred in the last five to seven years. However, as this study demonstrates, the level of administrative attention to the Title I regulations has been decidedly uneven in terms of specific regulatory areas and uneven in terms of effectiveness vis-à-vis the eight states included in our study.

While our findings led us to conclude that the current federal role has often been a critical factor in influencing the nature of basic state Title I approaches, they also revealed that state and local policies and practices pertaining to the funds allocation areas still need improvement and considerable work remains to be done to improve state and local performance in the program development areas. We view the federal role, as currently defined, to be appropriate for maintaining (and in two of the eight states significantly improving) current levels of state administrative effectiveness. However, a modification of the federal role is required to achieve major breakthroughs in state and local administrative effectiveness in the other six states.

The following, then, are our major conclusions about the strengths and weaknesses of the current federal approach to Title I administration.

1. *The basic framework of the current regulations must be preserved to assure the attainment of federal goals.*

We believe it is important to state explicitly that despite all the problems reported, our considered judgment is that the federal Title I regulations are not fundamentally dysfunctional, taken individually or

together. Rather, we found that the regulations, when enforced, provide the foundation for effective administration of Title I programs. As the preceding chapters demonstrate, the regulations have thus far succeeded in establishing and protecting the existence of categorical Title I programs against countervailing influences in local and state settings. Without the compliance categories of the federal Title I regulations, the interests of educationally disadvantaged populations stand in clear danger of being displaced, by districts and states, in favor of competing interests. However, serious effort must be made to clarify state and local understanding of the requirements in order to clear up remaining compliance problems, overcome rigid responses to federal expectations, and promote program designs in keeping with local resources and needs.

2. *The intergovernmental relationships that function in Title I in the mid-70s should not be viewed as unrelenting combat between the federal government and state education agencies, between SEAs and their LEAs, or between those who accept the principles of compensatory education and those who wish to use the funds for other purposes.*

A lack of sufficient knowledge and managerial capacity and a number of legitimate local factors and concerns contribute to problems of Title I program administration. Improving program implementation over the next decade must begin with the discovery of state and local resources, needs, attitudes, knowledge levels, and administrative capacity. We witnessed a positive attitude on the part of the majority of state and local administrators toward managing the Title I program more efficiently, in basic compliance with federal regulations and in a way that maximizes the probability of effective educational programs. A combative administrative style and the overt use of authority seem productive only where states or local districts refuse to comply with regulations or refuse to make efforts to improve the effectiveness of their programs. Where states and districts are cooperative, productive intergovernmental relationships may require keeping the use of overt authority and sanctions in reserve.

3. *During the last few years sufficient improvement has been made in program administration in many states and local districts to justify confidence in the basic intergovernmental administrative model embodied in the legislation.*

While we would argue that no major, fundamental change in assumptions is warranted, a number of modifications should be considered in order to enhance both accountability and program flexibility.

4. *Most of the eight states and 32 LEAs studied manage Title I in a manner generally consistent with federal expectations and in a manner that has been strongly influenced by the federal government.*

Some of the states and local districts are administering the Title I program in a manner that is highly incompatible with federal expectations, but these seem to be in the minority. The large majority of SEAs and LEAs in our study are sufficiently well motivated, structured, and staffed to enable them to meet satisfactorily most current federal expectations. Problems remaining in these states and districts are, for the most part, in areas in which federal expectations are either not clearly understood or too modest.

5. *Federal influence has been largely effective in inducing states and districts to address funds allocation responsibilities; it has been far less effective in inducing states and districts to attend to program development responsibilities.*

The federal government has been successful in fostering the development of a basic system of state and local policies and procedures for achieving accountability in the funds allocation areas. This system needs further refinement to maximize state and local performance. However, the system that has evolved is not currently equipped (in terms of motivation, knowledge, and capacity) to deal effectively with issues of program development. This deficiency is reflected in a general lack of systematic and sustained attention to these important responsibilities of states and local districts.

6. *The role orientation exhibited by an SEA is the most critical determinant of its administrative performance and the nature of LEA responses to state administrative initiatives.*

The federal government's interests are best served when state education agencies share federal program goals and exert leadership to assure compliance and program effectiveness. Ideally, the federal government should attempt to change the role orientation of states that currently view their Title I responsibilities as an administrative chore rather than a leadership opportunity. Though state and local contextual factors will probably make uniform attainment of that objective impossible, we are convinced that it is possible for the federal government to significantly affect an SEA's role orientation provided certain administrative policies and procedures are changed at the federal, state, and district levels.

9.3 THE NEED TO MORE CLEARLY DELINEATE FEDERAL, STATE, AND DISTRICT ROLES IN TITLE I ADMINISTRATION

In Chapter 8 of this report we pointed out that states and districts have developed their role orientations with respect to Title I administration through the interaction of federal and state-specific factors. The federal government has not directly pushed states and districts to adopt specific role orientations or attitudes toward their administrative responsibilities in Title I. Rather, federal attention has concentrated on improving state and district policies and procedures in particular functional areas. Instead of challenging and directly attempting to change basic state and local role orientations toward Title I administration, the federal government seems to work around them.

An important outcome of this compartmentalized federal approach and lack of attention to attitudes and role orientations is to reinforce limited state role orientations, particularly in nondirective, federally responsive states. For example, State D, because of various contextual factors, is reluctant to be more directive. USOE reinforces this hesitancy through its modest expectations for state administrative performance.

Further, there is reason to doubt that State D's Title I officials would know how to develop more directive strategies should they wish to do so. There is even further reason to doubt that Title I officials in State D would be allowed to become more directive unless there were federal pressures for them to do so. Similarly, in States G and H, and even in State C, there is nothing about the current USOE posture to dissuade these states from adherence to their current role orientations.

In considering the need for the federal government to encourage a state to become more directive and to elicit certain changes in state attitudes, the program development areas stand out as most in need of energetic and rigorous attention. As pointed out in Chapters 7 and 8, improving local program development policies and procedures seems to require special kinds of attention and a more program-oriented (as well as directive) state role orientation. That is, *while federal and state strategies to insure the institutionalization of sound, compliant procedures for dealing with most of the funds allocation issues have usually proven fairly effective where utilized, such strategies appear to be inappropriate with respect to program development responsibilities.* For example, reviewing documents to assure merely that needs assessment and evaluation activities have been conducted, that parents have duly signed district applications, etc., is simply inadequate. By contrast, reviewing the data and formulas used in determining school eligibility, concentration of effort, comparability, allocation of staff resources to schools, etc., coupled with the application of sanctions for noncompliance in these areas, usually appears to be a successful strategy.

We believe that the only way some states can be induced to become actively concerned with program development is for the federal government to provide positive encouragement and incentives for them to do so. In program development areas, exclusive reliance on audit procedures and punitive sanctions is clearly inappropriate and should be discouraged. In fact, we believe that federal dilemmas over Title I administration

are largely created by the fact that there is one set of regulations but two very different kinds of administrative orientations and strategies required to assure adherence to the regulations.

Basically, there is a need for refinement and redefinition of roles at all levels of Title I administration. Clarification to states and districts of federal regulations should contribute to refined or revised role definitions. For example, if districts receive guidelines which clarify complex requirements and present clear examples of compliant and noncompliant practices, the role expectations for district Title I directors in assuring compliance will be that much clearer than they are currently. The need for such active dissemination and technical assistance is especially acute in the student selection and supplanting/general aid areas. Such clarification should also prove particularly helpful to states and districts in understanding HEW's role in Title I administration. That is, it should be specified that the role of HEW is restricted to assuring that compliance standards set forth in such guidelines are met. As for the role of USOE, districts and states should be informed that it is twofold: (1) to make recommendations to help districts avoid HEW audit exceptions, and (2) to work cooperatively with states in order to improve state leadership and management capacity.

The role of USOE in helping districts avoid HEW audit exceptions is an established one and one that states seem to accept as legitimate and important. With respect to this role of USOE, clarifications of regulations and better coordination with HEW should result in even more effective performance. For USOE to work cooperatively with states in order to improve state leadership and management capacity, however, would require a significant modification of its current role.

9.4 THE NEED FOR NEW FEDERAL POLICIES AND ADMINISTRATIVE PROCEDURES

The following section deals with the implications of the conclusions cited above. While many of our suggestions for enhancing federal impact do not challenge the current orientation of federal officials in administering the Title I program, some do. These latter suggestions directly respond to our conclusion that *although current federal Title I policies and procedures usually have been appropriate and effective in dealing with problems associated with funds allocation areas, current federal strategies are largely inappropriate and ineffective in addressing equally important federal, state, and local program development responsibilities.*

For addressing program development responsibilities, new federal strategies and policies need to be developed while the federal government simultaneously expands upon its established strategies to deal with problems that remain in the funds allocation areas. Maintaining and continuing established strategies is necessary to assure that old problems do not reappear. We wish to emphasize that meeting these challenges at the federal level is feasible and essential if the Title I program is to achieve goals embodied in the legislation.

Given the findings of this study, suggested changes in the federal government's oversight of Title I administration at the state and local level would be characterized by the following five key principles or themes:

1. *Rigorous attention must be given to completing the implementation of the basic funds allocation accountability system in states and districts where large scale compliance problems persist:*

- in states, primarily where there are major means/ends compatibility problems affecting responsiveness to federal expectations.

- in LEAs, particularly where there are overall problems in administrative effectiveness.

2. *Rigorous attention must also be given to upgrading enforcement activities where major compliance problems continue to exist. Especially needed are:*

-more direct federal involvement with LEAs when states will not perform; and

-greater coordination of HEW audit and USOE Management Team Review processes.

3. *Continued attention to compliance must be maintained with objectives to:*

-close knowledge and management capacity gaps in states and local districts; and

-assure that state and local administrators do not begin to neglect compliance monitoring responsibilities.

4. *Increased attention must be given to program improvement and parent involvement, and it should be recognized that:*

-strategies may be required in these areas that are different from those that have been generally successful in assuring adequate attention to funds allocation requirements; and

-greater attention to program improvement and parent involvement should not be implemented at the price of neglecting funds allocation responsibilities.

5. *Increased attention must be given by SEAs to LEA administrative processes as well as to LEA compliance with particular regulations, since those processes are major determinants of actual levels of compliance at the school and classroom levels and in the program development areas.*

The following pages address eight major problem areas in Title I administration that we judge to be amenable to treatment through changed federal policies and procedures, and in some cases, changed federal strategies. Each discussion includes:

- A brief statement of the problem area.
- A brief statement of the recommendation.
- Elaboration on the problem area.
- Elaboration on the recommendation.
- Some of the major, readily discernible implications of these recommendations in terms of resources to implement them, who will be effected by them, what new problems might be generated, etc.

An attempt is made in this final section to strike a balance between vagueness and specificity. On the one hand we are confident that the general directions embodied in our suggestions are appropriate given our findings. On the other hand, we do not wish to give the impression that we have carefully considered the fine details of implementing particular changes nor that we have systematically addressed all the implications of our recommendations. Moreover, we are aware of the many concurrent NIE Title I research projects whose findings must be taken into account in developing any refined set of recommendations for an appropriate federal role in Title I administration. The following section thus presents only broad recommendations for improved federal Title I administration based on conclusions of the SRC Title I study.

9.5 KEY PROBLEM AREAS AND RECOMMENDATIONS

The following is a list of eight major problem areas observed in our site visits and the accompanying recommendations we consider appropriate in alleviating these problems.

PROBLEM AREA #1:

Interpretations of federal Title I regulations and suggestions on how to comply with them that are provided to states and districts are often vague or inconsistent.

Recommendation: *USOE should develop and disseminate more uniform interpretations of the Title I regulations; in addition, administrative coordination between USOE and the Division of Audits in HEW needs to be substantially upgraded.*

PROBLEM AREA #2:

There is inconsistency between USOE and HEW and there is intra-agency inconsistency within USOE and HEW as to what constitutes noncompliance and what fiscal penalties shall be imposed.

Recommendation: *The federal government should adopt, implement and actively disseminate uniform regulatory enforcement policies that are based on explicit principles of action in the event of state or local noncompliance.*

PROBLEM AREA #3:

There is unevenness across the states in federal dissemination relating to compliant and effective Title I administration. This results in lack of knowledge and managerial capacity at the state and local level.

Recommendation: *USOE should be required to disseminate to SEA's and SEA's, in turn to LEA's information pertaining to Title I legislation, regulations, guidelines, interpretations, and penalties in the event of noncompliance.*

PROBLEM AREA #4:

Attention to and understanding of administrative responsibilities in the area of parent involvement was minimal in most of the school districts visited.

Recommendation: *SEAs, with considerably greater assistance from USOE, should intensify their present level of effort to attain compliance by LEAs with respect to the parent involvement requirements.*

PROBLEM AREA #5:

SEAs in their oversight roles rely too heavily on superficial indicators in assessing local administrative effectiveness, especially in program development areas.

Recommendation: *The federal government should seriously consider changing (for many states) the annual LEA application and reporting cycle for Title I to a three- (or four-) year cycle.*

PROBLEM AREA #6:

The federal government has relied too heavily on superficial indicators in assessing state administrative effectiveness and has not adequately addressed the differing role orientations, needs, and capacities of different states.

Recommendation: *The federal government should seriously consider requiring SEAs to submit a comprehensive three-year state plan for administering Title I, with annual updates as needed.*

PROBLEM AREA #7:

Some states lack sufficient Title I administrative resources to adequately fulfill their administrative responsibilities.

Recommendation: *The federal government should redesign the administrative set-aside formula to take into account the number of LEAs in a state. It should also set a minimum set-aside level above the current figure. If possible, any increased state allocations resulting from this proposal should come from additional federal appropriations.*

PROBLEM AREA #8:

There is often an absence of adequate coordination at the federal, state and local levels between Title I and other related categorical programs.

Recommendation: *All federal and state compensatory education programs should be administered within the same department in each SEA and within USOE. In addition, states should be permitted to combine compensatory education funds with Title I if the net result is that the combined funds are administered in accordance with Title I rules and regulations.*

PROBLEM AREA #1:

Interpretations of federal Title I regulations and suggestions on how to comply with them that are provided to states and districts are often vague or inconsistent.

Recommendation: *USOE should develop and disseminate more uniform interpretations of the Title I regulations; in addition administrative coordination between USOE and the Division of Audits in HEW needs to be substantially upgraded.*

A. Elaboration on the Problem Area

One problem with the current federal regulations is not in their basic framework but rather in the inconsistent and unclear implementation of this framework.* Inconsistent or vague federal communications have led to a confusing array of state and local regulatory interpretations that, in turn, cover considerable variations in policy and practice--some of which variation seems not in the best interest of Title I eligible pupils. We discussed such problems in detail in Chapters 6 through 8. Appendix C presents a list of major areas of varying regulatory compliance interpretations on the issue areas explored in the case study states and districts.

The problem of unclear, inconsistent or contradictory federal regulatory interpretations is both reflected and reinforced in the direct contacts that take place among SEAs, LEAs, and federal government officials. We found it a frequent occurrence for USOE officials' interpretations to be inconsistent. For example, we were informed that while the USOE Title I headquarters in Washington operates with the understanding that Title I personnel may not perform school-wide duties (such as bus duty, hall duty, cafeteria duty) unless the Title I account is reimbursed

* See Robert Silverstein and Daniel M. Schember, An Analysis of the Necessity, Clarity and Representativeness of the Program Requirements Applicable to Local Districts Applying for Grants under Title I of the Elementary and Secondary Education Act of 1965. (Washington, D.C.: Lawyers' Committee for Civil Rights Under Law, December 1976).

for that portion of their time spent on these nonsupplementary duties, the USOE regional representative to State D allows Title I teachers in the state to perform such duties with no reimbursements to the Title I account as long as these duties are regularly performed by non-Title I instructional staff. In State C, a proposed parent education component for a district's Title I program was not approved by the USOE regional representative to that state because specific student achievements from such parent education activities could not be measured. In one district in State D, a similar project to that proposed in State C is considered by state Title I officials and the USOE regional representative to State D to be one of the state's outstanding programs to improve parental participation and the relationship between students and their parents.

Problems of unclear and inconsistent federal regulatory interpretation are also outstanding between USOE and HEW. Interviews with one HEW official at the regional level revealed that HEW officials in the audit division believe that some USOE interpretations, themselves, violate federal compliance standards. State G's officials were careful to get all USOE interpretations in writing to help insure against HEW audit exceptions. One district in State C received an audit exception because they restricted their needs assessment to the state prescribed areas of reading, math, and early childhood. Such restrictions by the state were, in fact, actively encouraged by USOE Management Team Reviews and by the USOE regional representative to that state.

Indeed, a pervasive theme throughout districts visited was the fear that despite their best efforts to be compliant, they would be subject to HEW audit exceptions because the interpretations of HEW auditors might differ from interpretations they themselves, state, or USOE officials had made.

Such a lack of federal administrative clarity and consistency is certainly counterproductive. As described in Chapter 8, autonomous

states that have had means/ends compatibility problems with USOE have sometimes exploited this situation by directly challenging the legitimacy of USOE authority to interpret the legislation (State A) or by simply ignoring those USOE recommendations to correct compliance problems that HEW auditors are unlikely to pursue (State H). Conversely, we found the federally responsive states frequently in the difficult position of wanting to be responsive to federal requirements but ignorant or confused about what types of policies at the state and local level would foster compliant as opposed to noncompliant practices. Such a state of confusion also places an undue burden on school districts and states to correctly predict HEW and USOE policy interpretations. Moreover, confusion and a desire to avoid trouble can lead to the abandonment of ideas for improving Title I program quality.

B. Elaboration on the Recommendation

To assure a uniform understanding of what constitutes compliant and noncompliant practice under the Title I regulations:

- There is a need for more consistency among USOE officials in interpreting the Title I regulations.*
- There is a need for better coordination between USOE and HEW.*

Clarification and coordination are most needed in the following areas:

- . "Needs Assessment"
- . "Supplanting" and "General Aid"
- . "Most in Need" with respect to student selection procedures
- . What constitutes adequate fiscal concentration of effort?
- . What constitutes an adequate focus on basic skills?

In some cases, more uniform interpretations may be sufficient to resolve problems. In other cases, developing uniform criteria for evaluating the adequacy of efforts may suffice. Specific details of

such interpretations will, of course, require careful attention. Also, there is a need for better coordination between USOE and HEW with respect to enforcement of Title I regulations. Plans for visits by USOE reviewers and HEW auditors need to be worked out jointly such that these review and enforcement activities complement one another.

C. Implications

1) Needless to say, were the federal regulations to be more uniformly interpreted, a good number of current state and local policies and practices would need to be adjusted. However, it is important to bear in mind that along with clearly disallowing certain policies and practices, such clarifications would clearly permit others that districts and states may have suppressed on the chance that they might be deemed noncompliant.

2) Adjustments within and between agencies may be called for to increase the feasibility of consistency in interpretations and inter-agency coordination. (For example, specialization of a group of HEW auditors in Title I auditing may be needed to increase the feasibility of coordination.) Also, any internal inconsistencies within USOE regarding appropriate federal policy would have to be settled if clear and uniform USOE interpretations are to emerge.

3) Increasing the efficiency and effectiveness of USOE and HEW activities will require developing comprehensive strategies such that the work of each group complements the other's. (For example, when a USOE Management Team Review reveals recalcitrance on the part of a state or district in heeding a recommendation to adjust a noncompliant practice, an HEW audit would be in order. Or, when an HEW audit reveals complex compliance problems in a state or district, a USOE visit to analyze the problem and pose solutions might be appropriate.)

4) Greater clarity and uniformity among interpretations of the regulations will, of course, not serve the intended purposes unless adequately disseminated.

PROBLEM AREA #2:

There is inconsistency between USOE and HEW, and there is intra-agency inconsistency within USOE and HEW as to what constitutes noncompliance and what fiscal penalties shall be imposed.

Recommendation: *The federal government should adopt, implement and actively disseminate uniform regulatory enforcement policies that are based on explicit principles of action in the event of state or local noncompliance.*

A. Elaboration on the Problem Area

With respect to the application of fiscal sanctions, there currently seem to be covert principles in operation at both the federal and state levels such as distinctions made between noncompliance that could have stemmed from ignorance or managerial capacity problems and noncompliance that clearly did not. (For example, a district had been informed by state or federal officials that a practice was noncompliant, had been provided adequate technical assistance to enable them to correct the problem, yet the district had failed to do so.)

The image from a state and district perspective is that there is confusion at the federal level. Some state and district personnel voiced concern that in such circumstances of confusion, political power of certain states or districts unduly influences outcomes. Whether there is truth in such perceptions is probably less important than that they exist and represent a problem in terms of federal authority.

B. Elaboration on the Recommendation

In the interests of fairness, order and promotion of respect for federal authority, there is a need for federal (and state) Title I officials to develop explicit principles for the application of fiscal sanctions. Where there now appears to be a de facto sliding scale of penalties, there is a need to develop clear principles for differential handling of audit exceptions, including alternative modes of applying sanctions.

Quite clearly, all areas of discretionary judgment will not be eliminated, but the amount of inconsistency can be considerably reduced.

Also, federal and state officials need to examine alternative modes of applying sanctions. For example, rather than requiring districts to return funds to the federal or state government from their Title I accounts (or withholding Title I funds to districts), the districts might be required to reimburse the government from district funds or to allocate district resources to the Title I program the following year. In this way, the Title I program in districts would not suffer from a reduction of funds, and districts might be prompted to be even more cautious about incurring fiscal penalties.

C. Implications

A set of specific federal principles for the application of fiscal sanctions will make the federal enforcement role in Title I more explicit than ever before. For this reason, such principles are likely to be actively resisted by many states and districts, especially those that currently have major means/ends compatibility problems with the federal government. Successful adoption and subsequent implementation of enforcement principles will, therefore, require uniform support within USOE and HEW in the face of considerable pressure from some state and local interest groups and federal legislators. To minimize problems of inadequate support in enforcing its authority, USOE might attempt to have enforcement principles incorporated into the Title I statute itself rather than to rely chiefly upon its own administrative authority in making these changes. USOE might also attempt to simultaneously recommend or enact on their own other federal administrative policies that are responsive to other needs and concerns of states and districts so that the federal thrust is not perceived as being one-dimensional.

PROBLEM AREA #3:

There is unevenness across the states in federal dissemination relating to compliant and effective Title I administration. This results in lack of knowledge and managerial capacity at the state and local level.

Recommendation: *USOE should be required to disseminate to SEA's and SEA's, in turn to LEA's information pertaining to Title I legislation, regulations, guidelines, interpretations, and penalties in the event of noncompliance.*

A. Elaboration on the Problem Area

Given resolution of Problem Areas No. 1 and No. 2, there remain problems relating to compliant and effective Title I administration which stem from lack of knowledge and capacity at the state and local levels. These include the following:

- Lack of knowledge of interpretations that have been made by USOE.
- Lack of knowledge of the regulations and how each component of them interrelates.
- Lack of knowledge of origins of restrictions.
- Lack of knowledge of probable consequences for noncompliance.
- Lack of knowledge of appeals channels and processes.
- Lack of knowledge on how to communicate with federal level decision-makers (e.g., in commenting on proposed regulations).
- Lack of capacity to utilize the above kinds of knowledge in developing and implementing sound management procedures.

The problem also encompasses differences in the levels of knowledge and managerial capacity among states and districts. Some are better informed than others, and some are better equipped to utilize their knowledge in developing and implementing sound management procedures.

In addition to information needs of administrative officials, there appear to be serious knowledge gaps among school staff and members of Title I Parent Advisory Councils. Part of the problem is inadequate federal dissemination to states and consequent inadequate dissemination by states to districts and districts to school staff and parents.

Another part of the problem is one of the questionable intelligibility of disseminated materials (abstract concepts that are not illustrated with concrete examples; terms that are not adequately defined; and in material for Title I parents, a lack of recognition that their vocabulary may be more constrained than that of the people who develop the materials, etc.).

There are also problems relating to changes in the regulations. School staff and parents do not understand how to communicate their concerns to federal decision-makers. The Federal Register version of proposed regulation changes suffers from all the problems of intelligibility noted above and is a document which is generally inaccessible to parents and school staff.

Although knowledge gaps existed to some degree in a number of policy issue areas, they were most pronounced in the program development areas. For example, there is considerable ignorance and confusion over what the concepts of "needs assessment" and "evaluation" mean and what the provision of a satisfactory needs assessment and evaluation entails. There are also considerable capacity problems in developing appropriate procedures for conducting needs assessments and evaluations. Such ignorance, confusion, and capacity problems often result in situations whereby districts, with tacit or explicit SEA approval, interpret the needs assessment and evaluation requirements very loosely. The needs assessment requirement is frequently interpreted as relating only (or primarily) to student selection procedures; and the evaluation requirement is often interpreted as calling for a mere reporting out of student

achievement test scores. Needless to say, when districts implement policies in accordance with these interpretations, little information is generated that is of use in program design or redesign.

B. Elaboration on the Recommendation

The following types of federal administrative strategies should be carefully considered as means to resolving the kinds of problems discussed above:

- 1) *The dissemination of guidelines that contain specific examples of types of local activities that are considered compliant and noncompliant by USOE and HEW.*

Such guidelines should go to both state and local education agencies in order to minimize the possibilities of communication breakdowns and misinterpretations. Some compliance areas seem to require more specificity than others. There should be no possibility that district practices, which accord with these guidelines, would be deemed noncompliant by HEW auditors. While it is not possible to indicate all types of unacceptable practice, the most common problems could be illustrated in such guidelines.

The guidelines could also indicate which federal offices may be contacted in obtaining technical assistance or definitive rulings on the legality of particular state or district policies or practices.

- 2) *The dissemination of information, in an easy to comprehend style, about program requirements and appropriate interpretations, options, exemplary practices, rulings and communications channels (in codified form with cross-referencing).*

Such manuals should be distributed to state and district Title I offices and to public libraries for access by school staff, parents and other community members.

- 3) *The encouragement of SEA and LEA staff to supplement available materials with their own situation-specific publications.*

USOE could also have available the necessary resources to assist SEAs and LEAs in the conduct of this activity.

- 4) *The systematizing of dissemination procedures so as to assure that information on new program requirements, interpretations, or exemplary practices is promptly published and distributed to all pertinent groups.*
- 5) *Dissemination of information such that districts and states are aware of who may apply penalties, on what grounds, the possible severity of penalties, and the procedures for appealing audit "exceptions" noted by federal officials.*

C. Implications

It is not easy or inexpensive to translate into an easy to comprehend style and keep up-to-date the large quantities of literature pertaining to Title I. Dissemination to accomplish the above objectives would be neither simple nor inexpensive. For example, in the needs assessment area, special experimentation, research and model development may need to be undertaken and specific guides prepared by both the federal government and the states before substantial progress can be made in terms of the meaningfulness of needs assessment activities. In addition, making information available, while critical, may not in itself be totally sufficient. It must frequently be accompanied by more personal and dynamic SEA/LEA interactions: technical assistance, in-service training, on-site consultation, telephone discussions, etc. A commitment to superior dissemination activities can serve as a catalyst for such interactions. On the other hand care must be taken lest these dissemination activities be viewed by states as substitutes for rather than facilitators of more personal state/local relationships.

PROBLEM AREA #4:

Attention to and understanding of administrative responsibilities in the area of parent involvement was minimal in most of the school districts visited.

Recommendation: *SEAs, with considerably greater assistance from USOE, should intensify their present level of effort to attain compliance by LEAs with respect to the parent involvement requirements.*

A. Elaboration on the Problem Area

Our study indicates a considerable shortcoming on the part of SEAs with respect to their willingness, capability, and expertise in assisting LEAs with parental involvement. For the most part, there appears to be either a reluctance or a casualness characterizing the administrative approach of SEAs to this compliance area. This is clearly indicated by problems at the local district level. While there are some notable successes, most LEAs give this requirement short shrift or only a nodding acknowledgement. This problem was discussed at some length in Chapter 7. Because a great deal of the difficulties could be prevented or eliminated through specific types of federal activities, we are separating this discussion from other more general discussions on increasing state and local knowledge and managerial capacity.

B. Elaboration on the Recommendation

The following specific types of activities appear in order:

- 1) *USOE should develop alternative models and sample materials, appropriate for different sizes and types of LEAs, for use by SEAs with their LEAs.*
- 2) *USOE should develop a technical assistance program to demonstrate and train SEA-level staff in various methods, approaches, and models that LEAs can utilize in meeting this requirement.*
- 3) *USOE should monitor SEAs regarding this requirement regularly and thoroughly, employing consistent criteria of adequacy.*

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- 4) SEAs should be encouraged to provide technical assistance for LEAs such that parents of Title I pupils can become both more knowledgeable and skilled in pertinent Title I parent involvement activities. Such assistance should primarily take the form of training activities and materials and should probably include parents as both trainees and instructors.
 - 5) SEAs should be encouraged to include in their administrative budgets an annual allocation for staff, materials and programs to enhance the parent involvement component at the LEA level.
 - 6) SEAs should encourage LEA budgetary set-asides for parental involvement activities, particularly in the area of parent activity coordination and support, specially developed materials, and training workshops for parents.
 - 7) At the USOE and SEA levels, guidelines, regulations and supportive materials provided to parents should be carefully prepared so that the variety of special needs of Title I parents are satisfactorily addressed.
 - 8) States and districts should be encouraged to work together in developing "due process" safeguards for Parent Advisory Councils.
 - 9) The manner in which LEAs will meet the parent involvement requirement should be carefully and thoroughly delineated in the districts' Title I applications to the SEA. This part of the proposal, as a minimum, should be reviewed by the district Parent Advisory Council (PAC) and countersigned by a district PAC officer. District Title I parents should also have participated in the development of at least this section of the proposal, and it should be readily available to all parents who request it.
 - 10) When Title I programs are monitored, both SEAs and LEAs should include interviews with Title I parents and PAC members to ascertain the extent and quality of parent involvement that exists in LEAs and schools, respectively.

C. Implications

These recommendations would entail a major adjustment in the time spent by SEAs in meeting this requirement. The SEAs' technical assistance activities would have to be extended to include dissemination, in-service training, and on-site consultation in this area. LEAs would also have to take major steps to plan for and facilitate improved parent

participation at the district and school levels. There is a possibility that some school administrators would continue to react negatively and defensively and attempt to offset such a thrust. In the rural states, in the smaller rural districts of all the states, and at the school level, much attention to assisting administrators in transforming these recommendations into practice will be required. Not only would more time be required, but additional funds for this purpose will be needed as well. Since this involves an attitudinal change as much as anything else, special care would have to be exercised in the planning, design, implementation, and evaluation of the suggested practices and activities in the early years following their commencement.

PROBLEM AREA #5

SEAs in their oversight roles rely too heavily on superficial indicators in assessing local administrative effectiveness, especially in program development areas.

Recommendation: *The federal government should seriously consider changing (for many states) the annual LEA application and reporting cycle for Title I to a three- (or four-) year cycle.*

A. Elaboration on the Problem Area

This basic problem is reflected in several findings of our study. We observed that:

- SEAs often have little or no knowledge of how LEAs actually plan, manage, and implement program requirements. This includes both funds allocation and program improvement requirements. In particular, insufficient attention is given to how LEAs provide oversight of school-level implementation to insure compliance with federal regulations and to encourage implementation of effective instructional services.
- Despite SEA certification of compliance, it was rare to find (in the 32 districts studied) systematic needs assessment, planning, and evaluation activities that are focused on improving the effectiveness of compensatory education programs. While the technology of evaluation is well advanced in some districts, the use of evaluation results in program decision-making is, at best, minimal.
- Needs assessment and evaluation activities are usually used only to match pupils with programs and to determine the extent to which pupils benefit from programs. They are rarely used to influence decisions about program design.
- SEAs have, in general, not communicated to LEAs that evaluation is an important local function. Accordingly, most local officials consider evaluation activities to be functions performed only to provide information for the SEA as required in the regulations.

- Evaluation of Title I for services other than instruction in the basic skills (such as in guidance, psychological, attendance, or health services) is virtually non-existent. (Such services tend to be more commonly found in large urban districts.)
- Annual evaluation activities occur after planning for submission of the next year's application is already completed at the local level. Only one of the eight states used district achievement test results to identify LEAs or schools in need of special attention prior to approval of the annual application.

The combination of: (a) minimal state attention to local administrative processes, (b) lack of serious state attention to needs assessment, program planning and evaluation functions as important local concerns, and (c) an administrative cycle in which annual program planning occurs prior to annual evaluations, all strongly reinforce the natural tendency of districts to conduct "business as usual" rather than to periodically examine the effectiveness of Title I programs. Reconsideration of the content of or the approach to Title I programs seems to occur only because of external events such as major increases or decreases in funding, changes in key staff, identification of major compliance problems, or other factors associated with poor administration that necessitate state intervention. Such external events of a significant enough magnitude to influence program design would seem not to be either evenly or regularly distributed among LEAs and schools; many districts can go along for years without experiencing some type of external event that forces a serious evaluation of compensatory education programs. The lack of periodic comprehensive evaluations should be of particular concern to the federal government since after just over ten years of Title I, many LEAs have settled into patterns of delivering Title I services that have become as institutionalized as most aspects of the regular instructional program.

The findings of this study also suggest, however, that states can administer Title I in a way that encourages both more compliant implementation of local programs at the school and classroom levels and

evaluation practices geared primarily to improving the effectiveness of these programs. For example, we observed that:

- States can influence local administration of Title I programs when: (a) the directions given to local districts are clear, and (b) local responsiveness is established through state oversight of local program operations (i.e., states are both directive and program oriented).
- The project application is a key administrative vehicle by which a state establishes its expectations for local program administration.
- There is no substitute for on-site contact (in which SEA staff visit schools), both through informal and frequent visits and through less frequent but comprehensive, in-depth program reviews.
- The management characteristics of state and federal administration (application approval, SEA monitoring of LEAs, USOE management reviews of SEA administration) can have a pronounced effect on how LEAs manage local programs. This suggests to us that changes in federal and state management activity can produce changes in local administrative practices.

These findings indicate to us that in order to assure more effective administration of Title I at the state, district and school levels, the structure within which administration occurs must:

- provide for more intensive and comprehensive SEA evaluation of LEA policies and procedures;
- encourage needs assessment and evaluation activities and procedures that lead to improvements in local programs and more effective use of Title I funds at the local level;
- assure each SEA's ability to continually monitor LEA performance and enforce the federal regulations; and
- avoid an increase in unnecessary reporting and paperwork that can be a hindrance to effective Title I administration.

B. Elaboration on the Recommendation.

A three-year application cycle would elicit more information about administrative processes than is currently the case, as well as a comprehensive, three-year program needs assessment and evaluation plan. In the third year of operation under an approved program application, the needs assessment, local program evaluation, and SEA management review findings would lead directly to program changes that would be incorporated in the application for the subsequent three-year period. The LEA should be required, under such an arrangement, to annually submit application amendments to the SEA for approval as well as to submit basic data about school allocations, comparability, participating students, and achievement scores that would aid the SEA in monitoring implementation of the local Title I program in accordance with the application. Site visits to LEAs would also be conducted during Years One and Two with regulatory compliance concerns stressed.

There is a trade-off embodied in this recommendation that may be attractive to policymakers and administrators at the federal, state, and local levels. State oversight and local planning and evaluation activities would be performed more comprehensively, more intensively and more thoroughly than is currently the case in nearly all of the states and districts included in this study. On the other hand, some of these activities would be performed less frequently. Frequency of superficial activity has not been found to be associated with administrative effectiveness in these programmatic areas.

1) Potential Requirements Under a Three-Year Cycle

(a) Every three years, SEAs would solicit applications from LEAs to cover the next three-year period. The major focus of this application would be on program development areas, especially those relating to needs assessment, program design, and evaluation; but attention would also be given to how the LEA plans to monitor

school-level implementation of all Title I regulations. There would be the expectation of extensive involvement of district personnel and parents in the needs assessment and summative evaluation activities. The SEA would be involved primarily through the comprehensive state management review of the local program.

- On a one-time basis during this time period, and probably during the first half of the application year (Year Three), a comprehensive needs assessment for the school district and a summative program evaluation based on data drawn from the first two years of operation under the current program would be conducted.
- There would be an annual accounting of the district's status and disposition with respect to meeting the program requirements for school selection, student selection (including provision of selection criteria and details about participants), concentration of effort, comparability, and assurance regarding the avoidance of general aid and supplanting.
- During the course of the application year (Year Three), a comprehensive state management review of the district's program would be conducted. This activity, planned in conjunction with the LEA's Title I program administration, would be scheduled during the first half of the fiscal year so that resultant recommendations can be considered by the district later in the year for incorporation in its multi-year application.
- During (the second half of) the application year (Year Three), the district would be responsible for preparation of its program design and its multi-year application for the SEA. Both of these would draw on data obtained from the district's comprehensive needs assessment, the summative and formative program evaluations, the SEA's comprehensive management team review, SEA monitoring and technical assistance activities, and inputs from district and school PACs, staff and administrators.

(b) An LEA's multi-year application would include detailed descriptions of the district's plans with respect to:

- Administration, management, and coordination of the Title I program for each of the fiscal years covered by the application.
- Successful conduct of the related program development components; namely, needs assessment, program design, evaluation, and parent involvement activities. (Note: In terms of the first two of these components [comprehensive needs assessment and program design], a special more detailed and indepth proposal may be desirable during the year prior to the application year when these two program development requirements would be scheduled to begin.)

(c) Districts would be required to submit annual progress, accountability, fiscal, and brief statistical reports to the SEA; the nature of many of these may be based on the SEA's own multi-year plan to elicit and aggregate pertinent data for state and federal requirements.

- Major reporting of evaluation outcomes for a district's Title I program should cover the two years of program operation prior to the application year (so that findings can be utilized in program design and application preparation). In addition, however, the third year of the program's operation under the multi-year time-frame should also be included in a subsequent evaluation that encompasses the entire three year period. If the findings of this latter evaluation are substantially different from earlier results, then appropriate program modifications can be accomplished through Year One or Year Two application amendments.

2) Making Efficient Use of Time

While there are numerous federal strategies that could result in increased state attention to local administrative processes and

program development concerns (including some activities mentioned previously in this section), we find the idea of an expanded administrative cycle to be particularly attractive because of its unique potential to make efficient use of limited time. SEAs would be allowed to schedule LEAs so that only one-third (or one-fourth if a four- rather than three-year cycle were chosen) would be required to submit full-scale applications each year instead of 100 percent of them. The SEA could then spend more of its available time and resources conducting on-site monitoring visits, providing technical assistance, and perhaps undertaking other related oversight and management activities which our findings indicate as often having been slighted in the past. LEAs would also be able to use their additional savings in time and resources for better program administration, planning, and evaluation. Because the more demanding programmatic portions of the application would be submitted only once every three or four years with more time available to the LEAs for this purpose and more emphasis directed to these provisions by the SEA, this change should be accompanied by an improvement in the quality of proposals and applications submitted to SEAs.

This approach also calls for the SEA to conduct a major comprehensive and intensive management team review toward the end of every multi-year cycle. In this way, all aspects of a district's Title I program would be systematically monitored and reviewed at least once every three years--a process which is currently either non-existent or substantially inadequate in six of the eight states visited.

Finally, the recommended multi-year cycle seeks to sequence important repetitive activities on an annual, alternate year, or full-cycle basis so that these activities are performed as often as necessary (i.e., neither too frequently nor too infrequently) and at an optimal point in time to be useful for related administrative and implementation purposes.

C. Implications

Moving to the three year cycle described above will not be an appropriate policy for all states. Some states may still be experiencing annual changes in administrative procedures as they strive to put their house in order, and the administrative performance of others may not yet meet even modest federal expectations. There are examples of these conditions in some of the eight states included in this study. In such cases, the state and its local districts may not be ready or even interested in moving towards a more intensive state/local relationship. The use of the annual application and reporting cycle should be retained in such instances with the federal government focusing on clearing up major existing problems before giving such states more administrative flexibility and responsibility.

Even in the majority of states that could well benefit from this recommendation, implementation would not be easy. Initiation of this recommended change in the application and reporting cycle would require extensive planning and preparation by SEAs and LEAs. Undoubtedly, there would have to be a pilot period. Considerable technical assistance (not dissemination workshops) would need to be provided SEA administrators by USOE. Some SEAs may require more administrative resources to take on their more directive and programmatic stances while still paying adequate attention to regulatory compliance concerns. Revised application forms, manuals, instructions, and review procedures would have to be developed and thoroughly field-tested. Spot-checks during the early years would need to be more frequent by both USOE and the SEAs. It may be that several volunteer states should be selected to try out the process and to field-test various alternative approaches; however, this decision would probably require postponing this approach for the entire country by as much as four or five years.

Because every third year a district would be expected to increase the intensity of its administrative routine, it is quite likely that

additional administrative resources will have to become available to an LEA during this particular year. In the "off" years, it is likely that LEAs would budget administrative costs at a considerably lower level than would be required during the application years. The LEAs would, accordingly, require assistance and support from the SEA so that the increased expenses and time associated with the demands for more comprehensive planning, development, evaluation, and community and district personnel input can be both justified and satisfactorily budgeted. The SEA may need to develop a special formula or allocation procedure for this purpose. Another way this might be accomplished is by planning to use "carry-over" funds from preceding years.

There may be some who would argue that it is dangerous to reduce the application and review period for LEAs from one year to three years. It is our considered judgment, however, that for the majority of states that have implemented administrative oversight procedures that are both workable and routine, state oversight would be improved, assuming appropriate regulatory safeguards are employed. And, just as important, the planning and evaluation procedures required in the year prior to submission of the program application should lead to a situation in which a greater number of LEAs than is currently the case take on major responsibility for improvement of their own programs. Indeed, we believe that the findings of this study are consistent with those from earlier studies of organizational change in that, in the final analysis, program improvement is dependent on local receptivity to change. The superordinate level of government can establish the framework within which a program must operate, it can prod local agencies into considering change, and it can punish local agencies for noncompliant behavior. But on the fine points that separate compliant program implementation at the school and classroom levels from noncompliant implementation, and on those aspects of program design that lead to more effective services for target pupils, both compliance and the effectiveness of instruction will be no better than the understanding and commitment of principals, teachers, and parents. The current relatively superficial annual application and reporting requirement fails to hold the promise of promoting that level of understanding and commitment.

PROBLEM AREA #6:

The federal government has relied too heavily on superficial indicators in assessing state administrative effectiveness and has not adequately addressed the differing role orientations, needs, and capacities of different states.

Recommendation: *The federal government should seriously consider requiring SEAs to submit a comprehensive three-year state plan for administering Title I, with annual updates as needed.*

A. Elaboration on the Problem Area

This recommendation is designed to enable the federal government to recognize and directly address problems with, and potentials for, varied state role orientations. In Chapter 8, five distinct role orientations in the eight states were presented. Each orientation presents unique challenges and opportunities for the federal government. In some states, an authoritative and prescriptive federal role may clearly be in order. In others, there may be a need to create incentives and/or to provide more resources and technical assistance to facilitate state administrative improvements. In still other states, efforts to accommodate state goals while still maintaining federal regulatory standards may be the most appropriate and important federal administrative objective. The federal government needs an administrative approach with enough flexibility to meet these different needs but also with enough accountability to insure effective federal oversight.

Since most states have developed a structure and administrative procedures for district compliance with most components of the funds allocation regulations, we see the temptation as currently being great for both USOE and most SEAs to settle into a "system maintenance mode." In fact, some of the eight states are primarily operating in such a mode already, as indicated in Chapter 3. These states respond as necessary to incremental and frequently superficial recommendations from USOE management review teams, rather than continually searching for ways to upgrade local performance beyond minimal levels. There is a need to

extend some of the accountability procedures that seem to be working so well (when implemented) between SEAs and LEAs to the USOE/SEA relationship if these states' administrative performance is to be continually upgraded.

There is also a need for an administrative approach that allows for differential treatment of states according to need, capacity, and (where appropriate) state specific goals. In nondirective, federally responsive states, the major federal challenge is to create sufficient incentives for states to emphasize local administrative processes and program development concerns. In States A and H, the legitimacy of federal authority needs to be more clearly established and an effective accountability system in the funds allocation areas needs to be created. In States B, E, and G, administrative resource constraints may be a major barrier to more effective Title I administration. State C needs substantial federal technical assistance and support and probably additional resources to better meet program development concerns. In each of the above cases, we did not view the federal government as being adequately responsive to these states' unique role orientation, needs, and capacities.

B. Elaboration on the Recommendation

The federal government should consider requiring multi-year state management plans from each SEA in which both the unique role orientations, needs, and capacities of states are considered and in which states are held directly accountable for their performance.

Such a system might include the following types of features:

1) Basic Plan Features

Each state would detail, every three years in a management plan, the specific procedures to be used in application review, monitoring, technical assistance, evaluation, and fiscal accounting functions. In addition, the staffing for carrying out these procedures would be identified, including the proposed organization of the staff. Appropriate state procedures might vary, depending on state specific factors,

but at a minimum all states must be able to provide evidence that funds allocation requirements would be met.

Each state would specify performance objectives and procedures for evaluating its objectives at the end of the three year term of the plan. SEA and federal officials would agree on a set of reasonable standards for judging the effectiveness of SEA implementation of its management plan. To facilitate the effective administration of this requirement, the federal government would develop specific management categories and parameters for judging administrative effectiveness in each category.

2) Administrative Option Possibility

The management plan might include state administrative options such as the three-year application cycle discussed earlier. Other potential state options might include:

- Combining Title I and State Compensatory Education Funds. This presumes that the combined compensatory education program will conform totally to the Title I regulations.
- Consolidating All Federal Compensatory Education Funds. The plan would have to address how the SEA would re-organize, and the type of assistance to be offered to LEAs.
- Obtaining Incentive Administrative Set-Aside Funds. This section of a state plan would serve as a proposal for use of additional set-aside funds for specific administrative purposes.

The possibility of including one or more administrative options in a state management plan is, of course, dependent on other federal policies such as acceptance of a three-year local application cycle and funding for a specially targeted administrative set-aside fund. Assuming such acceptance is forthcoming, the state use of an administrative option should require the joint approval of the SEA and USOE.

Specific approval, utilization, and accountability criteria would be limited to each administrative option. For example, the following rules and procedures might be appropriate for an "incentive set-aside" option:

- The funds allocated under the incentive grant would be specifically targeted to address areas of mutually agreed upon priorities as delineated in the state management plan. Program objectives and implementation strategies would address significant areas of state program weakness. Major negative USOE Management Team Review findings or HEW audits could be used to establish such areas. The incentive program could address either program development or compliance issues provided that what is addressed is an area of significant program weakness and that there is agreement on the areas of concern between the state and federal government. For some states, the possibility of using this money in conjunction with a new three-year application cycle could be considered.
- The targeted incentive set-aside money would continue through the effective period of the state management plan.
- Targeted incentive monies under a new state/federal plan would be partially contingent on federal evaluation of the effectiveness of previous state plans in meeting shared federal and state goals.
- Changes in the purposes for which these specially targeted funds are used may be made while the state plan is in operation, provided that these changes are agreed to by USOE.

3) Federal Oversight Features

Under this proposal, Federal Management Team Reviews would continue in each state on an annual basis. During these visits, federal monitors would investigate both the implementation of the management plan and the adequacy of the plan in meeting federal regulatory and program improvement concerns.

At the conclusion of annual visits federal monitors would recommend: (1) specific changes in state administrative policies and/or procedures to better implement the state management plan, or (2) amendments to the plan itself if major weaknesses in the plan are noted. As is currently the case, SEAs would be required to respond in writing to USOE Management Team Review recommendations. HEW auditors would continue their function as previously indicated (see Recommendation 1).

After three years, the administrative performance of the SEA would be comprehensively evaluated by both the SEA, itself, and the federal government in a joint, coordinated review procedure. The federal government would conduct a major site visit at the time and fully explore all aspects of state program operation. The state would prepare a report indicating how effectively it has met its management plan objectives and where administrative improvements need to be made. The state report plus the comprehensive federal visit (with an accompanying report) would serve as the basis for federal/state negotiations on subsequent state management plans.

C. Implications

An appropriate question about the feasibility of this strategy concerns its probable effect on nondirective and/or goal incompatible states. While very appropriate for states that are basically directive and have demonstrated the capacity to compliantly and effectively administer the program, differential administration could create an environment in which states currently responding only minimally or non-compliantly to the federal requirements might perform even less effectively. We believe, however, that provided there are adequate procedural safeguards, this approach to differential administration would not reduce the pressure for such states to fulfill their responsibilities. On the contrary, by requiring these states to indicate precisely how they intended to fulfill their administrative responsibilities in Title I, the federal government would, for the first time, be systematically

confronting state policy inadequacies emanating from limited or incompatible role orientations. We are also convinced that some of these states will be motivated by the incentives, options and opportunity for more involvement in their own planning and evaluation to change their basic role orientation when so confronted. As mentioned above, both more flexibility and accountability are necessary if the positive impact of the federal role is to be enhanced.

Two types of questions will emerge in response to a recommendation that requires SEAs to submit a comprehensive state plan that must be approved by the federal government and which may require different states to adopt different approaches to administering a single federal program or set of programs. First, are the incentives provided for in the mechanism great enough to make SEAs want to improve their administrative effectiveness? That question cannot be answered until state officials make judgments about both the nature of the plan requirements and the intensity of the scrutiny to which the plan will be subjected by USOE officials.

Pro forma development, review and approval of state management plans would, of course, be insufficient to justify the labor and expenses involved. Conversely, if the procedure is viewed as likely to be filled with endless conflicts over each SEA's proposed management procedures, acceptance and subsequent performance is also likely to be minimal--at least in terms of getting states to move beyond basic improvements vis-à-vis funds allocation requirements.

Second, and closely related, is it feasible to expect the USOE to provide careful scrutiny of each plan, both from a capacity and a political standpoint? Do USOE officials in the Division of Education for the Disadvantaged have sufficient knowledge to establish criteria for making realistic judgments about the reasonableness of state plans, especially in the context of previous state performance? Even if such knowledge

and capacity is not currently available at the federal level, we believe it would be possible to develop it provided more support and an appropriate mandate to do so were forthcoming. It would also be essential that the USOE be able to direct an SEA to make specific changes before application approval is granted; sanctions would need to be introduced for assuring that SEAs change their plans in response to USOE recommendations and that they implement procedures as promised in their plans.

We believe that there are two factors working for successful implementation of this concept of differential administration. First, most of the states that we visited seemed to have a cooperative and productive relationship with federal officials, and that relationship will serve as a foundation for development of a realistic state plan. Second, given the experience of the first decade of ESEA, one should have considerable patience about the pace of progress in a new direction. What seems to be most important at this time, in our view, is the opportunity to begin to focus attention on unique needs, limitations, and potentials of each state education agency in its administration of the Title I program.

PROBLEM AREA #7:

Some states lack sufficient Title I administrative resources to adequately fulfill their administrative responsibilities.

Recommendation: *The federal government should redesign the administrative set-aside formula to take into account the number of LEAs in a state. It should also set a minimum set-aside level above the current figure. If possible, any increased state allocations resulting from this proposal should come from additional federal appropriations.*

A. Elaboration on the Problem Area

In two of the eight states visited, we found the small amount of funds set-aside for state Title I administration (1% set-asides) to have a major and direct impact on current state administrative practices in Title I. In State G we noted that the low set-aside there has been largely responsible for limiting the orientation of the SEA Title I staff. The Title I director indicated that if he had more resources he would regionalize his operation in an effort to more effectively communicate with local school districts. As it is, the SEA has to rely almost exclusively on dissemination of documents to get its concerns across, both in the program development and compliance areas. Direct interpersonal communication between the SEA and most of the LEAs is rare. While document dissemination in the program development areas appears helpful, it is clearly insufficient in districts with limited technical capacity. Similarly, the dearth of on-site monitoring activity in this state has also had negative consequences at the district level.

Limited set-aside has also affected State E's program, although in a somewhat different way than was the case in State G. State E has devoted most of its limited set-aside funds to monitoring for compliance. Despite this emphasis, however, field consultants usually spend only one day in a school district. This limits the effectiveness of the monitoring activities and makes anything but the most rudimentary types of technical assistance activities impossible. This state would very much

like to expand its capacities in the program development areas and, as with State G, desires to increase its interpersonal contacts with local school districts.

B. Elaboration on the Recommendation

By increasing the administrative set-aside level and basing the set-aside allocation to a larger extent on the number of LEAs in the state, the likelihood of more effective Title I administration in smaller states will be increased. While we are not convinced that additional funds in States E and G would bring with them major changes in these states' limited role orientations, we are convinced that these states' present budgets permit very little else. Thus, additional resources may have to be combined with other federal strategies for substantial improvements to occur in these states.

We found the number of LEAs to be a critical factor in determining the degree of state administrative oversight required. Each LEA has a distinctive Title I program, with distinctive problems and potentials. While many of the larger states had enough Title I resources to uncover these districts' problems and exploit their potentials, the possibility of doing this was hampered in the smaller states by the limited set-aside. In addition, we noted that in at least one of the small states visited (State G), the federal government did not push harder for the state to adopt more of a leadership posture because they recognized that the state had limited administrative resources. Thus, a by-product of this recommendation will be to curb the tendency of states and the federal government to excuse a state's lack of administrative oversight on grounds of scarce state Title I administrative resources. Further, if basic program accountability is to be realized in Title I, appropriate state resources must be provided along with mandated state responsibilities.

C. Implications

The implications of this proposed change depend very much on whether these increased resources to smaller states will come from new federal entitlements or a redistribution of existing set-aside funds. If the change involves a redistribution of existing monies, we foresee some difficulties. First is the political difficulty of some of the larger states losing portions of their state set-aside entitlements. Also, although some states visited clearly were affected more by limited state administrative set-aside resources than others, we would not say that any of the states had too large an administrative set-aside for their needs. In State C, for example (a state with a moderate-sized Title I entitlement and a relatively small number of LEAs), the relatively large Title I administrative set-aside has had a positive impact in allowing the state to deal with compliance concerns fairly comprehensively in each of its districts on an annual basis; but to further improve Title I administration in State C, there may be a need for additional resources.

If no more resources are available, some Title I administrative monies could be redistributed from states with smaller numbers of LEAs to those with larger numbers of school districts, but the ideal solution to the set-aside problem is a larger state set-aside allocation coupled with a revised formula. This recommendation would probably require an increased Title I appropriation by Congress and a change in the statute.

PROBLEM AREA #8:

There is often an absence of adequate coordination at the federal, state, and local levels between Title I and other related categorical programs.

Recommendation: *All federal and state compensatory education programs should be administered within the same department in each SEA and within USOE. In addition, states should be permitted to combine compensatory education funds with Title I if the net result is that the combined funds are administered in accordance with Title I rules and regulations.*

A. Elaboration on the Problem Area

Local school districts receive federal funds through a number of grant programs, many of which have as their basic purpose the provision of compensatory education services, often to overlapping target groups of pupils. These programs include not only ESEA Title I, Part A, which is the subject of this study, but also the Migrant Section of Title I, the Bilingual Education Act, the Indian Education Act, Right to Read, the Emergency School Assistance Act, ESAA Title VII with its general compensatory education and bilingual sections, the low-income housing section of P.S. 874, Follow-Through, and state compensatory education and bilingual programs. The burden of coordinating programs rests with the LEA in general and each individual school in particular. While absolute duplication of services to individual pupils rarely occurs, considerable administrative time within an LEA must be committed to making sure that the sometimes conflicting requirements of each program are met, and sometimes to warding off competition among programs to, for example, provide the reading component for disadvantaged pupils. Administrative responsibility within USOE and the typical SEA is dispersed throughout several different offices and a number of key individuals. LEAs have had only minimal success in handling this multitude of potential funders, and the result is often an array of categorical programs operating along side each other with little apparent relationship. We have noted these areas of concern in the findings reported in Chapter 4.

Administrative burdens to LEAs are further heightened by the requirement that separate "audit trails" must at all times be maintained down to the school-level for Title I and state compensatory education programs. Separate audit trails are even required when state funds serve as a direct add-on to Title I funds and are allocated and administered according to Title I rules and regulations.

B. Elaboration on the Recommendation

We see the following types of USOE strategies as being helpful in alleviating the above problems:

-Administering all federal aid programs whose principal goal is compensatory education in one division, preferably the Division for Education of the Disadvantaged. These would include the following:

- . ESEA Title I, Part A, Part B, Migrant, Neglected and Delinquent.
- . Bilingual Education Act.
- . Right to Read.
- . North American Indian Education Act.
- . Emergency School Assistance Act.
- . P.L. 874, low-income housing section.
- . Follow-Through.

-Urging states to locate staff responsible for each of the above areas within an office for compensatory education in each SEA.

-One of the major functions of SEA compensatory education staff would be to develop prototype coordination models, to assist LEAs in "pocket budgeting"* funds from the various federal and state programs to meet LEA and school needs, and to coordinate services provided by the various programs to assure that needs are met.

*"Pocket Budgeting" by a school district, refers to the practice of allocating multiple categorical resources in a manner that best meets local concerns and priorities while still fulfilling all categorical requirements.

- Encouraging coordinated planning for use of compensatory education funds, most notably through a consolidated local application form.
- Permitting LEAs and schools to have a single compensatory education parent advisory council.
- Not requiring separate audit trails below the district level where state compensatory education funds serve as a direct add-on to Title I funds and where these funds are allocated and administered according to Title I rules and regulations.
- Not requiring separate audit trails below the district level where state compensatory education funds serve the same target population as Title I in terms of the criteria for educational deprivation (same percentile or grade level cut-off for participation), but allowing state funds to be allocated to non-Title I schools.
- Developing and disseminating program coordination models where Title I and state compensatory education programs are not totally compatible. The models would illustrate how state and federal programs can be better coordinated and would include attention to permissible allocation procedures (to schools), selection of pupils and provision of services.

C. Implications

The multiplicity of special categorical programs for different but often overlapping groups of pupils, and their frequently scattered location within federal and state education agencies, has its basis in the different political constituencies responsible for creating each program in the first place. Program consolidation is often seen by supporters of the "individual ornaments on the Christmas tree" as reducing their special visibility and power. Concerns with visibility and power and competition for funds exist at the state as well as the federal level. Intra-bureau competition at either federal or state levels can be an impediment to effective program administration at the local level. Administrative coordination within the USOE and the SEAs would have to provide at least some of the individual identification associated with the present programs in order to be politically viable.

A special case in this proposal is the Emergency School Assistance Act which is administered by officials in the ten USOE regions with only nominal involvement of SEA staff. Particularly since ESAA became heavily involved in direct compensatory education services for minority pupils, the potential for conflict with Title I programs has been considerable. Shifting administrative responsibility for ESAA from the USOE regions to the SEAs would probably present a major political obstacle to administrative consolidation.

The recommendations concerning permission not to maintain separate audit trails would probably require changes in Title I regulations, though not necessarily changes in the legislation.

APPENDICES

- A. Previous Studies of Federal
Program Administration
- B. Selected Bibliography
- C. Major Areas of Varying
Regulatory Compliance
Interpretations

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APPENDIX A

PREVIOUS STUDIES OF FEDERAL PROGRAM ADMINISTRATION

Our approach to the design of this comparative policy study of Title I administration at federal, state and local levels has drawn heavily upon earlier studies of the implementation of federal programs in general and Title I in particular. Those that have had the most direct and immediate influence on our approach are as follows:

-Studies of the administrative and political implementation of federal aid to education programs. These include Federal Aid to Education: Who Benefits? Who Governs?, directed by Joel S. Berke and Michael W. Kirst for the Syracuse (University) Research Corporation (1970);¹ The Planar Corporation's study of ESEA Title I administration at the federal and state levels (1973);² and State Education Agencies and Discretionary Funds: Grease the Squeaky Wheel: Implementation of ESEA Title V, by Jerome T. Murphy (1974).³ These studies provided us with an analysis of state responses to federal programs up to the early 1970's as well as a number of recommendations about how program administration could be improved.

-The "change agent" studies conducted by the RAND Corporation (1975).⁴ This set of studies focused on the responses of local school districts to federal programs intended to promote educational change.

¹ Joel S. Berke and Michael W. Kirst, Federal Aid to Education: Who Benefits? Who Governs?, (Lexington, Massachusetts, Lexington Books, D.C. Health & Company, 1972.

² "The Silken Purse: Legislative Recommendations for Title I of the Elementary and Secondary Education Act," The Planar Corporation, submitted to the Department of Health, Education, and Welfare, Contract No. HEW-05-72-224, Washington, D.C., October 1973. See also Peter G. Briggs, "A Perspective on Change: The Administration of Title I of the Elementary and Secondary Education Act," Department of Health, Education, and Welfare, Contract No. HEW-05-72-224, October 1973.

³ Jerome T. Murphy, State Education Agencies and Discretionary Funds: Grease the Squeaky Wheel, Lexington Books, D.C. Health and Company, Lexington, Massachusetts, 1974.

⁴ Paul Berman and Milbrey W. McLaughlin, "Federal Programs Supporting Educational Change, Vol. I," A Model of Educational Change," HEW R-1589/1-HEW, Santa Monica, California: The RAND Corporation, 1974; Paul Berman and Milbrey W. McLaughlin, "Macro and Micro Implementation," A RAND Paper, P-5431, Santa Monica, California: The RAND Corporation, May 1975.

-Studies of the evaluation of federal programs, most notably those produced by the Urban Institute between 1971 and 1977 that have focused on non-education programs⁵ and Milbrey McLaughlin's analysis of efforts to evaluate ESEA Title I.⁶ The contribution of these studies to our project is in the conceptualization of factors that constitute key linkages between federal, state and local agencies.

A. Studies of the Administrative and Political Implementation of Federal Aid to Education Programs

The Berke/Kirst, Planar and Murphy studies were specifically designed to find out what happened when funds were made available to state education agencies for the purpose of administering federal education programs. Relying predominately on studies of the politics of education in a number of states and more general examinations of state education agencies, both of which had been conducted in the 1960s, these efforts provided an understanding of how states were responding to the availability of federal funds and their responsibilities for administering those funds. Each study also provided recommendations for improving the effectiveness of state administered federal programs.

Who Benefits? Who Governs? The Berke/Kirst comparative case studies of federal aid administration for eight major federal programs were conducted in California, Massachusetts, Michigan, New York, Texas and Virginia in 1969 and 1970.⁷ The study teams did not systematically go into local school

⁵ Joseph S. Wholey, et. al., "Title I Evaluation and Technical Assistance," Washington, D.C.: The Urban Institute, 954-22, February, 1971; and Richard E. Schmidt, Pamela Horst, John W. Scanlon, and Joseph S. Wholey, "Serving the Federal Evaluation Market," Washington: The Urban Institute 962-24, January 1977. One of the first Urban Institute Evaluation Studies by Wholey and his associates directly addressed Title I evaluation and management issues.

⁶ Milbrey W. McLaughlin, Evaluation and Reform: The Elementary and Secondary Education Act of 1965, Title I, The RAND Corporation, R-1292-RC, January 1974; idem, "Implementation of ESEA Title I: A Problem of Compliance," Teachers College Record, Vol. 77, No. 3, Teachers College, Columbia University, February 1976; "Evaluation and Reform: The Case of ESEA Title I," The RAND Corporation, 1974.

⁷ Joel S. Berke and Michael W. Kirst, op. cit.

districts, though documentation regarding LEAs was examined and SEA officials were queried about conditions in and relationships with their local districts. The major focus of this analysis of state administration was the importance of differences in state political culture in determining the outcomes of federal policy, differences that were notable even in states as metropolitan as the six included in the study.

The variety of ways by which federal aid is administered stems primarily from differences in state political cultures. Federal aid is channeled into a existing state political system and emerges as a mixture of federal priorities and frequently quite different, if not conflicting, state priorities. This combined delivery mechanism ensures that the implementation policies will not be uniform among the states, especially since the sanctions and incentives available to the federal government are insufficient to alter significantly the traditional patterns of state educational policy. Yet, over a long period of time, federal administrators and guidelines do exert a perceptible impact on state policies, so long as federal objectives are not changed.⁸

Though they found that state education agency bureaucracies usually predominate over governors, legislatures and pressure groups, Berke and Kirst observed that SEA administrative procedures were affected by federal regulations that signaled a mandatory change in state behavior. And while SEA relationships with local districts proceed according to historical patterns of behavior, those relationships and the on-going routines and appropriate procedures of the SEA vary widely among states. Of particular importance to the administration of federal programs were the differences observed among SEAs in the extent to which they exhibited assertive versus passive behavior towards local districts, the nature of state leadership, particularly the chief state school officer, and the extent to which the SEA exhibited an "audit mentality" versus a leadership posture.

⁸ Ibid.

Berke and Kirst recommended that USOE oversight of SEAs be characterized by differential administration in which more assertive and leadership oriented states would be permitted greater flexibility in their administration of federal programs. Wider participation from legislators, teachers, students and community agencies as well as parents was urged to reverse the "top-down" compliance strategy. Berke and Kirst also recommended that the federal government encourage state-level comprehensive planning towards meeting educational needs and systematic state assessment of program effectiveness.

The Planar Corporation Study. The study of Title I by the Planar Corporation conducted in preparation for the consideration by Congress of renewal of ESEA in 1974 has a number of direct substantive and methodological linkages to our project.⁹ Planar staff conducted extensive interviews with USOE Area Desk personnel responsible for monitoring the practices of SEAs, made site visits to five states and administered a survey to ten additional states and 36 local districts. Like Berke and Kirst, the political climate of each state was assumed to be a major determinant of administrative practices, and those practices were found to vary considerably from state to state. Recognizing that change was occurring in the administration of the program, they note that, "the quality and pace of the changes have varied from state-to-state to the point where today it is almost a contradiction in terms to refer to a national Title I program." In practice, the Planar staff found Title I to be conceptually related to revenue sharing: many districts seemed to be using the funds as general purpose aid.

The policy recommendations drawn by the Planar staff from their study emphasized four principles:

⁹"The Silken Purse," op. cit.

- ° Title I should have a relatively small set of streamlined regulations.
- ° Specific standards for program operation should be established in the regulations.
- ° The legislation and regulations should provide for considerable flexibility in SEA management of Title I.
- ° Strong incentives should be provided for SEAs and LEAs to comply with the standards in order to minimize resort to the sanction of demanding repayment of amounts misspent.
- ° The legislation should promote administrative accountability at all levels of government.

The specifics of the Planar recommendations address the development of incentives to enhance the capacity of state education agencies and local districts to operate more effective Title I programs. Considerable attention was given in the report to the development of new ways to calculate the state administrative set-aside in order to better meet the needs of small states with large numbers of programs to monitor and to encourage states to provide more services to local districts.

State Education Agencies and Discretionary Funds: Grease the Squeaky Wheel. Murphy's study was concerned with the use of ESEA Title V funds to strengthen state education agencies, and the federal government's ability to affect SEA decisions about the use of those funds.¹⁰ The framers of the ESEA legislation assumed that the ultimate success of the Act would be dependent upon the capacity of SEAs to upgrade their own capabilities in order to provide leadership to local school districts. Title V of the Act provided SEAs with considerable discretion over the identification of each agency's management needs and the ways for meeting those needs through the use of federal funds. In Title I, on the other hand, state responsibilities are prescribed and the process of federal management reviews is intended to influence the manner in which SEAs fulfill those responsibilities.

¹⁰Jerome T. Murphy, op. cit.

In examining SEA use of Title V funds in nine states--very intensively in three of those--Murphy provided us with a useful picture of intra-agency pressures for the utilization of "slack" resources and the constraints to operational reform of agency procedures, particularly in light of minimal federal direction. For the purpose of this study we were particularly concerned with the difficulties encountered in developing a systematic planning and evaluation capacity in state agencies. But, the study of ESEA Title V also provides a picture of the opportunities for change, particularly as "client bureaucracies" for federal programs are developed. It is particularly important to understand the contrasts between federally funded SEA decisions and activities that are predominately "state driven" and those in which the federal government has a more directive role to play.

B. The RAND "Change Agent" Studies

The RAND Corporation's analyses of the extent to which innovation-oriented federal programs actually "took hold" in local schools were reported at about the same time that our study was beginning.¹¹ Because the RAND studies were concerned with the ability of the federal government to affect reform at the local level, they provided an up-to-date picture of the realities of program implementation that characterize the attainment of national purposes in education. By focusing on the federal/local relationship as a change problem rather than as a compliance problem, the RAND studies began to fill in the fuzzy area between those who are preoccupied with Title I's allocative goals and those who are convinced that federal prescriptions--the rules and regulations--absolutely inhibit the creativity of local administrators and teachers.

¹¹Paul Berman and Milbrey W. McLaughlin, op. cit.

Several findings from the "change agent" studies are relevant to the evaluation of the intergovernmental administration of Title I. First, the RAND research team directed by Paul Berman and Milbrey McLaughlin found that the process of implementation rather than the technology of the innovation or the influx of federal dollars dominated project outcomes. Second, successful projects seemed to be characterized by mutual adaptation, the notion that both projects and settings had to change each other. Indeed, researchers who participated in the RAND study have more recently used the term partisan mutual adaptation to connote not only the need for the superordinate agency and the local setting to adapt to each other, but to also capture the idea of the significant stakes involved in the process of adaptation.¹² Third, the receptivity of the school setting to the innovation was a critical factor in successful implementation. Finally, and not surprisingly, local districts and schools were found to vary considerably in the capacity to implement--to adopt and adapt--educational innovations.

The RAND "change agent" studies are particularly relevant to an understanding of the role that process plays in the attempt to improve the content and the implementation of Title I at the district and school levels, even though two important distinctions must be noted between the types of federal programs investigated by RAND and Title I. First, most innovation-oriented federal programs provide funds to a school district for a limited period of time--one to three years--whereas Title I funds are continually available and, in the view of some critics, have actually become overly institutionalized in the same manner as regular school programs. Second, the "change agent" programs usually involve a specific instructional innovation for each site, whereas Title I permits considerable discretion with respect to instructional strategies as long as programs address the needs of educationally disadvantaged

¹²Dale Mann, "The Politics of Changing Schools," NASSP Bulletin, (Reston, Virginia: National Association of Secondary School Principals, May 1977), pp. 57-66.

pupils. In contrast, however, Title I tends to be more prescriptive regarding allocation procedures, pupil selection and, to a lesser degree, planning and evaluation procedures than the typical "change agent" program.

The importance of implementation process and the concept of mutual adaptation to the attainment of federal program goals is the major contribution of the RAND studies to the design and conduct of this study of Title I. We sought to address the question of adaptation in two ways; first, to identify ways in which federal (or state) requirements or prescriptions inhibit "appropriate" mutual adaptation; second, to provide a better sense of when and under what conditions adaptation becomes subversion of federal purposes to local concerns and needs; and third, to determine the degree to which states view their administrative responsibilities under Title I as a vehicle for promoting change at the district level.

C. Federal Program Evaluation Studies

There has probably been no greater frustration associated with Title I than the general inability of evaluations to demonstrate the effectiveness of programs in improving learning outcomes. Numerous evaluations of Title I have been conducted, as well as comparable attempts at evaluating federal programs in areas unrelated to education. While our comparative case analysis of Title I administration at federal, state and local levels does not address learning outcomes, previous evaluations of federal programs have uncovered a set of factors that describe the important linkages that exist from one level of government to another.

Evaluation and Reform. Milbrey McLaughlin considered problems of program administration at federal and state levels in her study of efforts to evaluate the effectiveness of Title I between 1965 and 1973.¹³

¹³ Milbrey W. McLaughlin, op. cit.

After interviewing numerous federal officials and examining federal and state documents, she concluded that the trend in the late 1960s and early 1970s to tighten up the legislation, rules, and guidelines had been based on an unrealistic view of administrative behavior.

Successful implementation of Title I programs, McLaughlin contends, is determined by the interdependent relationship among four factors. The first is common goals: officials at the state and local levels must share and mutually understand the objectives of the program that they are expected to implement. The second factor is knowledge: officials at each level of the enterprise must know (a) how to effectively achieve an objective and (b) they must have the information necessary to determine the success of subordinate agencies and institutions in carrying out mutually agreed upon plans. Third, there must be incentives for compliant or effective performance: a workable system of rewards and sanctions contingent upon carrying out prescribed or mutually agreed upon activities. Finally, the federal government and, in turn, the states must possess effective authority to ensure compliance: an authority based upon the ultimate ability to reward or punish, but one in which the "rewards and sanctions are removed to the background."¹⁴

In her study, McLaughlin found that a major problem inhibiting program implementation was the lack of common agreement about the specific goals of Title I. Compounding differences among federal, state and local officials in the broad purposes to be served by Title I, the often conflicting interpretations of rules and regulations that emanated from USOE in the early years made it even more difficult for state and local officials with the best of intentions to identify the specific objectives that they were expected to share with their federal counterparts. Lack of knowledge about agreed upon objectives made it difficult for such officials to design compliant programs, and particularly easy for those who did not share the broad goals of Title I to "hide behind" the ambiguities.

¹⁴ Ibid.

Neither the incentives nor authority available to federal and state officials were used effectively, in McLaughlin's view, and the sanctions and controls that state officials have available are too little or their application too late to be realistic in terms of their needs to act or they are unwilling to use the power that they do have.

In her conception of the critical factors influencing federal/state and state/local administrative relationships, McLaughlin contributed substantially to our approach to this study. In addition, since her conclusions conformed to the conventional wisdom of the early 1970s, they served as a useful set of assertions to examine as our study teams visited LEAs and schools.

The Urban Institute Program Evaluation Studies. Since the early 1970s, Joseph S. Wholey and his associates at the Urban Institute have been engaged in a number of program evaluation projects, most of these for federal level noneducation related agencies.¹⁵ Out of the series of projects has come the notion of "evaluability assessment": assessment of (a) the status of program management and (b) the feasibility and likely utility of program evaluation.¹⁶ While we have made no attempt in this study to systematically determine the "evaluability" of Title I programs in each of the 32 LEAs and 116 schools that our study team visited, we have drawn upon the principles of effective program management that have come out of the Urban Institute's efforts. Wholey argues that three criteria must be satisfied if a program is to be managed effectively: those in charge of the program must set objectives for the program that are in some way measurable, there must exist testable assumptions linking program activities to accomplishment of program objectives; and those in charge must have the incentive, motivation, ability, and authority to run the program.

¹⁵ Joseph S. Wholey, et. al., op. cit.

¹⁶ Ibid., p. 92.

Like McLaughlin, Wholey sees the common understanding and acceptance of program goals or objectives to be a critical element in effective management. "One of the most important findings of evaluability assessment may be that different policy and management levels are making program decisions based on different sets of objectives for the program."¹⁷

The Urban Institute studies have given particular attention to development of appropriate performance monitoring systems for federal programs, and monitoring is certainly a central concern in this study of Title I administration. Wholey cites four steps necessary to an appropriate system:

- ° Establish agreement with management on which objectives and activities are to be monitored and are satisfactorily measurable.
- ° Establish agreement with those to be monitored (program staff or grantees) on which activities and results will be monitored.
- ° Develop procedures to obtain the type and quality of information required.
- ° Assure utilization of the monitoring system produced.

If implemented, such a monitoring system also represents a set of operating principles about the nature of a relationship between two levels of government or two levels of an organization, such as between the central office of a school district and individual schools. The legislation, rules and regulations of Title I lead the state/local relationship in this direction in Title I. USOE administrative procedures implemented through the annual Management Team Review process represent a less formal implementation of these steps than does the application/evaluation process that characterizes the state/local relationship. We expected to find wide variation among local districts in terms of the

¹⁷ Ibid., p. 93.

EXHIBIT A-1

THE CONTEXT OF INTERGOVERNMENTAL RELATIONS IN
THE ADMINISTRATION OF ESEA TITLE I

RESPONSIBILITIES

- . Determine county (and therefore state allocations)
- . Determine program regulations
- . Approve state plans
- . Monitor SEA and LEA performance
- . Assess program effectiveness
- . Provide technical assistance to states
- . Interpret rules and regulations

FACTORS THAT INFLUENCE PROGRAM OPERATION

HEW/USOE

- . Congressional expectations
- . Reactions from state and local agencies
- . Reactions from interest groups
- . Capacity
 - Resources: availability of staff and support funds
 - Skills and experience of staff
- . Intra-agency coordination and competition
- . Posture towards SEAs and LEAs (assertive versus passive)
- . Resolution of conflict events with particular states

STATES

- . Provide assurance to federal government of intent to operate program in compliance with regulations
- . Approve project applications from LEAs
- . Determine sub-county allocations
- . Provide technical assistance to LEAs
 - To assure compliance
 - To improve program operations
- . Monitor local projects to assure operation of program in accordance with application "contract"
- . Establish compliant procedure
- . Submit annual evaluation report to federal government
- . Submit annual fiscal report to federal government
- . Submit funds distribution and use report to federal government

- . Political and social context in which educational decisions are made and implemented
- . Historical relationship between SEA and LEAs
- . Political influence of particular LEAs
- . Administrative style or role orientation
 - Compliance versus program improvement
 - Directive versus nondirective
- . Prior experience with federal agencies
 - Audits
 - Management team reviews
 - Idiosyncratic interpretations of requirements
- . Capacity
 - Resources: availability of staff and support funds
 - Skills and experience of staff
- . Values of key actors
 - Chief State School Officer
 - Federal programs or Title I director
- . Nature and relationship of state program in same area
 - Interest and involvement of governor and legislature
 - Fiscal and programmatic relationship
- . Changing fiscal context
- . Number of LEAs and projects to be monitored
- . Organizational structure

(Continued)

RESPONSIBILITIES

- . Conduct need assessment and design projects to meet needs
- . Determine allocation of funds to schools and pupils in compliance with federal regulations
- . Involve parents in decision-making process
- . Evaluate project effectiveness
- . Maintain appropriate fiscal records
- . Submit fiscal and programmatic reports to SEA
- . Monitor project implementation

FACTORS THAT INFLUENCE PROGRAM OPERATIONSCHOOL DISTRICTS

- . Size of district
- . Size and importance of federal program
- . Type of district
 - Urban
 - Suburban
 - Rural
- . Changing fiscal context
- . Management and programmatic capacity
- . Leadership of superintendent
- . Role and influence of Parent Advisory Council
- . Idiosyncratic characteristics and programs; i.e., desegregation
- . Relationships between SEA and LEA program staff
- . Prior experience with compliance issues
 - Audits
 - Monitoring reviews
- . Basic educational style
- . Presence, nature and size of other categorical programs
- . Collective bargaining contract

SCHOOLS

- . Identify participating pupils
- . Design instructional activities for pupils (this will be a district function in many places)
- . Implement project activities
- . Coordinate project activities with regular and special programs
- . Improve learning
- . Involve parents in decision process

- . District policies and priorities
- . Leadership of district staff
- . Competence of district staff
- . District program designs
- . District oversight
- . Leadership of principal
- . Presence of other categorical programs (state and federal)
- . Role and influence of parents
- . Concentration of high need pupils
- . Turnover of staff
- . Concentration of funds
- . Centralization/Decentralization of authority

district/school relationship in Title I, and our field work indicates that that is the case. Most important, however, the component steps of the monitoring process, the relationship that they represent and the supporting administrative activities required to implement the process constitute a process standard that we have used to assess the effectiveness of inter-level relationships in administering Title I.

D. The Context of Intergovernmental Relations in the Administration of Title I

Successful implementation of national policy regarding ESEA Title I is determined by a host of critical factors that operate at each level of the intergovernmental system: federal, state, district, school and classroom. Exhibit A-1 on the preceding two pages summarizes the responsibilities or functions of HEW/USOE, the SEAs, LEAs and individual schools in operating the program and the variety of factors identified in the previously reviewed studies as having an effect on program operation at each level.

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APPENDIX C

MAJOR AREAS OF VARYING REGULATORY COMPLIANCE INTERPRETATIONS IN OUR CASE STUDY STATES AND DISTRICTS

Needs Assessment

- Is an adequate needs assessment related to the way students are selected, the way the program is planned, or both?
- What constitutes adequate or minimally compliant activity in this area?
 - . Certification that students selected are in need?
 - . Certification that students selected are "most in need?"
 - . Certification that program components selected are in an area of greatest need?
 - . Certification that allocation of program component resources are proportional to need?
 - . Certification that the nature of the program designed for each student in Title I is related to that student's specific needs?
 - . Any combination of the above?
- How much state administrative discretion is allowable in this area?

Program Design

- What constitutes an adequate focus on basic skills?
- What prerogatives and limitations does a state have vis-à-vis disapproving applications for faulty program designs?
 - . Can disapprove if potential is high for noncompliance.
 - . Can disapprove if it conflicts with state regulations or guidelines (but meets federal standards).
 - . Can disapprove for any reason.

Parent Involvement

- What should parents be doing at PAC meetings?
- What constitutes minimally compliant behavior in this area?
- How much state administrative discretion is allowable in this area?

Evaluation

- What (if anything) do districts have to do in this area beyond submitting student achievement scores to the state?

Comparability

- What constitutes adequate local effort to insure comparability maintenance?
 - . Monthly reviews with appropriate adjustments?
 - . Semi-annual reviews with appropriate adjustments?
 - . Adjustments only when major shifts occur in staffing and/or student populations?

Resource Allocations to Schools

- Should school eligibility rankings and the level of educational deprivation in Title I schools be factors in determining Title I resource allocations to schools? If so, how should these factors be taken into account? How much state administrative discretion is allowable vis-a-vis this concern?

School Selection

- What are acceptable and non-acceptable criteria for justifying "skipping" of eligible schools?
- How much state administrative discretion is allowable in the area of the skipping justification?
- How does the "no dilution of services" clause in the regulations relate to the selection of otherwise ineligible schools for Title I participation?

Student Selection

- How are criteria for determining who is an educationally disadvantaged child established?
 - . Who should design the criteria--state, district or school?
 - . What criteria should be used, how explicit need they be?
 - . How much administrative discretion at each level is allowable in the establishment of educational deprivation criteria?
 - . Must the criteria be uniform across a state, district or school?
- How does the federal expectation of "one month's gain for every month in the program" affect the "most in need" requirement?
- How does the federal requirement that Title I programs be of "sufficient size, scope and quality to give reasonable promise of substantial progress" relate to the "most in need" requirement?
- How does the "no dilution of services" clause in the regulations relate to the selection of otherwise ineligible students?

Concentration of Effort (Fiscal)

- What constitutes a minimally compliant state policy in this area?
 - . Any state policy?
 - . A "\$300 per pupil" state policy or greater?
 - . A "1/2 above state and local effort" policy or greater?
 - . No fixed criteria but general state attention to this area?
- Can state or local funds be combined with Title I (if program-matically commingled) in meeting the concentration of effort requirement?

Supplanting/General Aid

- What constitutes a proper relationship between the Title I funded program and the locally funded basic instructional program at the school level?
 - . A student cannot miss reading or math for Title I.

- . A student may miss reading or math to attend Title I classes but must make it up later in the day, week, month, term, etc.
 - . A student may miss reading or math to attend Title I classes if the Title I program is in another subject area.
 - . A student may miss reading and math to attend Title I classes if the Title I service is considerably more intensive.
 - . A student may miss some reading and math to attend Title I classes but must get most of their reading and math in the regular classroom.
 - . A student must get a "double dose" of activity in whatever area he or she is being pulled out from (e.g., social studies, speech, physical education, science, etc.).
- Can a Title I teacher perform school-wide "duties?"
 - Can non-Title I students use Title I equipment and materials?
 - How does the "no dilution of services" clause in the regulations relate to the supplanting/general aid requirement?
 - What criteria are appropriate in separating basic from supplemental program components? Should these criteria be applied at the district and/or the school level?
 - How does the "excess costs" provision of the federal regulations relate to this issue area?